

## **Exhibit A-2**

$$\begin{array}{r} 100 \\ 100 \\ \hline 200 \end{array}$$



Shutterstock, Inc.  
350 Fifth Avenue  
New York, NY 10118  
Ebill through CounselGo

Atty No.: 00750  
Client ID: 50744-00009  
Invoice: 459045

November 17, 2022  
Page 2

**ads. Elliot McGucken**

**Fees through October 31, 2022:**

10/01/22	Revise and draft expert report (3.0).	E. LACKMAN	3.00	1,545.00
10/02/22	Review and revise updated draft of expert report (0.9).	E. LACKMAN	0.90	463.50
10/02/22	Email to Eleanor Lackman and Andrew Raff regarding strategy for meet and confer with opposing counsel.	E. NGUYEN	0.10	27.50
10/03/22	Review updated draft of expert report with exhibit and revise same (1.2); conference with A. Raff regarding strategy on discovery responses pertaining to follow up from plaintiff (0.5).	E. LACKMAN	1.70	875.50
10/03/22	Conference with R. Benyamin regarding documents relied upon by Steve Heck and retrieve documents to produce re Heck expert report support from Itasca relativity database and bates number same for production (0.9); download client files from box for production and email to client regarding .xml files (0.4)	E. MOSES	1.30	195.00



Shutterstock, Inc.  
350 Fifth Avenue  
New York, NY 10118  
Ebill through CounselGo

Atty No.: 00750  
Client ID: 50744-00009  
Invoice: 459045

November 17, 2022  
Page 3

10/03/22	Review responses and objections to Shutterstock's latest set of discovery demands. (0.4); Review and prepare potential supplemental production materials sent by Shutterstock. (0.3); Draft and revise notice of subpoena to Smug Mug; serve on opposing counsel. (0.2); Review subpoena, strategy with Eleanor Lackman on Flickr subpoena, and follow up with counsel for SmugMug. (0.5); Emails to Eleanor Lackman and to opposing counsel regarding meet and confer obligations. (0.2)	E. NGUYEN	1.60	440.00
10/03/22	Meeting with Andrew Raff regarding meet and confer letter and expert testimony.	E. NGUYEN	0.50	137.50





Shutterstock, Inc.  
350 Fifth Avenue  
New York, NY 10118  
Ebill through CounselGo

Atty No.: 00750  
Client ID: 50744-00009  
Invoice: 459045

November 17, 2022  
Page 4



10/04/22	Conduct additional review of expert report and draft memo and notes for expert regarding open items (0.4); review and comment on list of documents reviewed (0.3); correspondence with S. Heck regarding summary of conclusions and open questions (0.8); check expert report for additional clean up and confirm finalizing of same (0.7); review and comment on incoming expert report (0.2).	E. LACKMAN	2.40	1,236.00
----------	---	------------	------	----------



Shutterstock, Inc.  
350 Fifth Avenue  
New York, NY 10118  
Ebill through CounselGo

Atty No.: 00750  
Client ID: 50744-00009  
Invoice: 459045

November 17, 2022  
Page 5

10/04/22	Emails and testing and methods to convert .xml files to usable pdfs (0.5); upload production of expert relied upon materials to ftp for service and organize production files (0.2)	E. MOSES	0.70	105.00
10/04/22	Email to opposing counsel regarding inquiry on Shutterstock's meet and confer deficiency letter.	E. NGUYEN	0.10	27.50
	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
10/05/22	Review and comment on proposed joint letter regarding deposition-related issues (0.7); review and revise joint letter on recent discovery deficiencies (0.3); review and revise summary memo for use at upcoming court conference (0.6).	E. LACKMAN	1.60	824.00
10/05/22	Emails with team regarding production and prepare production of add'l Google analytics, image histories and reviewer guidelines xml file, circulate for review and upload to ftp for service and organize production files (1.5)	E. MOSES	1.50	225.00



Shutterstock, Inc.  
 350 Fifth Avenue  
 New York, NY 10118  
 Ebill through CounselGo

Atty No.: 00750  
 Client ID: 50744-00009  
 Invoice: 459045

November 17, 2022  
 Page 6

10/05/22	Incorporate and address comments from Eleanor Lackman on conference preparation outline and prepare documents in PSF folder. (0.8); Serve supplemental production to opposing counsel. (0.2); Email to opposing counsel regarding deficiencies in RFP 4 and ROG 3 responses and invitation to meet and confer. (0.1); Emails and strategy with Eleanor Lackman regarding Shimmin Errata. (0.1); Draft and revise proposed joint letter regarding RFP4 and ROG 3 deficiencies. (0.9); Emails to opposing counsel regarding RFA deficiency letter and post-deposition deficiency letter with exhibits. (0.2); Prepare conference outline and review outstanding issues, summarize outstanding motions and letters and outstanding discovery. (1.8); Address issues and questions relating to supplemental production of documents. (0.4); Address issues relating to RFA deficiency letter, and emails on strategy regarding the same to Eleanor Lackman. (0.3); Prepare supplemental production of documents to opposing counsel. (0.5); Draft and revise letter to opposing counsel regarding deficiencies and objections relating to McGucken's deposition. (0.7); Review and draft and revise letter on RFA deficiencies based on Plaintiff's revisions and section of letter, and incorporate Eleanor Lackman's comments. (0.8)	E. NGUYEN	6.80	1,870.00
----------	--	-----------	------	----------



Shutterstock, Inc.  
 350 Fifth Avenue  
 New York, NY 10118  
 Ebill through CounselGo

Atty No.: 00750  
 Client ID: 50744-00009  
 Invoice: 459045

November 17, 2022  
 Page 7

10/06/22	Review Complaint photographs and compare to registrations for R. Benyamin (1.6)	D. KNISS	1.60	240.00
10/06/22	Prepare for court conference (0.3); participate in same (2.0); draft report to client regarding same (0.4).	E. LACKMAN	2.70	1,390.50
	[REDACTED]			
10/06/22	Emails to server regarding closing of service to Flickr.	E. NGUYEN	0.10	27.50
10/06/22	Telephonic status conference before Judge Woods.	E. NGUYEN	1.90	522.50





Shutterstock, Inc.  
350 Fifth Avenue  
New York, NY 10118  
Ebill through CounselGo

Atty No.: 00750  
Client ID: 50744-00009  
Invoice: 459045

November 17, 2022  
Page 8

				
10/07/22	Review Complaint photographs and compare to registrations for R. Benyamin (.8)	D. KNISS	0.80	120.00
10/07/22	Draft outline of expert rebuttal report for S. Heck (0.8).	E. LACKMAN	0.80	412.00
10/07/22	Meet and confer with Laura Zaharia regarding discovery deficiencies.	E. NGUYEN	0.90	247.50



Shutterstock, Inc.  
 350 Fifth Avenue  
 New York, NY 10118  
 Ebill through CounselGo

Atty No.: 00750  
 Client ID: 50744-00009  
 Invoice: 459045

November 17, 2022  
 Page 9

10/07/22	Email to Andrew Raff regarding communications with Shutterstock's licensees for the photography. (0.1); Email to Alexandra Zusman regarding errata and deadline. (0.2); Provide update of meet and confer to Eleanor Lackman and prepare a confirmation email to opposing counsel regarding the same. (0.5); Review email from Rebecca Benyamin regarding newly produced documents and licensee emails. (0.1); Prepare for meet and confer with Laura Zaharia regarding three deficiency letters and incorporate prep with comments from Eleanor Lackman. (0.5)	E. NGUYEN	1.40	385.00
10/07/22	Review and analyze copyright registrations, and exchange internal emails regarding same (0.9); prepare for and attend telephone conference with L. Zaharia to meet and confer regarding discovery deficiencies and joint letter to court (1.7); review plaintiff's document production (0.2); exchange internal emails regarding Maddrey expert report (0.2); review email from L. Zaharia regarding meet and confer call (0.1).	R. BENYAMIN	3.10	852.50





Shutterstock, Inc.  
350 Fifth Avenue  
New York, NY 10118  
Ebill through CounselGo

Atty No.: 00750  
Client ID: 50744-00009  
Invoice: 459045

November 17, 2022  
Page 10

10/10/22	Email to opposing counsel with redline draft of deficiency/joint letter regarding RFAs. (0.2); Email to opposing counsel stating that the McGucken transcript is available for review and signing. (0.1); Email to opposing counsel with footnote edit of letter and other edits and invitation to modify as necessary before filing joint letter. (0.1); Draft and revise meet and confer letter on RFA deficiencies in light of plaintiff's comments and edits. (0.4); Review and provide analysis on letter from opposing counsel regarding meet and confer confirmation and edits to proposed joint letter. (0.2)	E. NGUYEN	1.00	275.00
10/10/22	Review T. Maddrey expert report (0.7); review and analyze research regarding case dockets and publications of T. Maddrey (1.5); review redline comparison of T. Maddrey expert report in this case and Itasca (0.2); review internal emails regarding meet and confer for discovery deficiencies for joint letter to the court (0.2).	R. BENYAMIN	2.60	715.00
10/11/22	Manage and maintain deposition transcripts and exhibits (.8)	D. KNISS	0.80	120.00
10/11/22	Strategy call with S. Heck regarding approach on rebuttal report; draft note to A. Raff regarding documents to collect.	E. LACKMAN	1.20	618.00



Shutterstock, Inc.  
350 Fifth Avenue  
New York, NY 10118  
Ebill through CounselGo

Atty No.: 00750  
Client ID: 50744-00009  
Invoice: 459045

November 17, 2022  
Page 11

10/11/22	Email with Eleanor Lackman regarding strategy of joint letters relating to discovery deficiencies and plaintiff's additions.	E. NGUYEN	0.20	55.00
	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
10/11/22	Emails regarding joint letters to court and meet and confer (0.2); review redline comparison of T. Maddrey expert report (0.7); review research regarding T. Maddrey dockets as counsel or amicus (0.1); video conference with S. Heck regarding rebuttal expert report (0.8); exchange internal emails regarding documents for S. Heck (0.4); review deposition transcript of E. McGucken for testimony regarding licensing (0.7); search for and assemble documents for S. Heck (0.4).	R. BENYAMIN	3.30	907.50
10/12/22	Prepare data for a document production (.9)	D. KNISS	0.90	135.00
10/12/22	Prepare highlighted Maddrey report focusing on areas for rebuttal expert response.	E. LACKMAN	0.90	463.50
10/12/22	Download client documents from box and upload and organize in client documents folder and circulate same and create working copies (0.2); organize production service records (0.1)	E. MOSES	0.30	45.00





Shutterstock, Inc.  
350 Fifth Avenue  
New York, NY 10118  
Ebill through CounselGo

Atty No.: 00750  
Client ID: 50744-00009  
Invoice: 459045

November 17, 2022  
Page 12

10/12/22	Review and analyze privilege and redaction log from opposing counsel. (0.2); Serve supplemental document production to opposing counsel. (0.2); Draft and revise deficiency letters to opposing counsel in form of joint letters; and send to Eleanor Lackman. (0.4); Coordinate with Dalton Kniss to prepare production to opposing counsel with communication with licensee documents. (0.2); Review list of URLs and send updated subpoena to Dimi at Flickr and copy opposing counsel as based on meet and confer narrowing. (0.4); Coordinate with Elana Moses and review documents in Salesforce including communications and review for potential production. (0.8); Draft and revise RFA letter per Eleanor Lackman addressing outstanding deficiencies in RFA responses. (1.3)	E. NGUYEN	3.50	962.50
10/12/22	Review section of E. McGucken deposition transcript regarding licensing (0.1); search for, review, and assemble documents to send to S. Heck regarding rebuttal expert report (1.0); prepare email to S. Heck regarding materials to review for rebuttal expert report (0.4); review email from D. Alexopoulos regarding Flickr links (0.1); review email from A. Raff regarding licenses and subscription plans (0.1).	R. BENYAMIN	1.70	467.50



Shutterstock, Inc.  
350 Fifth Avenue  
New York, NY 10118  
Ebill through CounselGo

Atty No.: 00750  
Client ID: 50744-00009  
Invoice: 459045

November 17, 2022  
Page 13

10/13/22	Draft memo to expert regarding licensing uses (0.7); meeting with E. Nguyen regarding Tuesday discovery filings per court order (0.3); review and revise joint letters to court on interrogatory answers (0.5), privilege (0.5), and requests for admission (0.5); review and comment on updated SmugMug subpoena (0.1).	E. LACKMAN	2.60	1,339.00
10/13/22	Email to opposing counsel regarding meet and confer invitation per Judge Woods' order on outstanding discovery issues and scheduling.	E. NGUYEN	0.10	27.50
10/13/22	Meeting with Eleanor Lackman regarding discovery issues and supplemental briefing.	E. NGUYEN	0.50	137.50
10/13/22	Prepare email to S. Heck regarding materials for expert rebuttal report (0.2); exchange internal emails regarding examples of uses (0.3); search for and collect examples of uses and complaints filed against licensees (0.3); review email from E. Lackman to S. Heck regarding expert rebuttal report (0.1).	R. BENYAMIN	0.90	247.50
10/14/22	Review and revise joint letter ordered by court (0.4); review and revise motion objecting to production of deposition transcripts (0.9); review updated expert report and provide feedback on same (0.4).	E. LACKMAN	1.70	875.50



Shutterstock, Inc.  
 350 Fifth Avenue  
 New York, NY 10118  
 Ebill through CounselGo

Atty No.: 00750  
 Client ID: 50744-00009  
 Invoice: 459045

November 17, 2022  
 Page 14

10/14/22	Draft and revise supplemental briefing regarding motion to compel per Judge Woods' order. (5.1); Draft and revise ECF 52 based letter to include comments from Eleanor Lackman, finalize and serve to opposing counsel. (0.4); Email to Andrew Raff and internal strategy emails to team regarding document production supplementation per Judge Woods' order. (0.3); Draft and revise letter per Judge Woods' Order regarding outstanding issues remaining in letter ECF Doc. No. 52; send analysis to Eleanor Lackman. (1.6)	E. NGUYEN	7.40	2,035.00
10/14/22	Review internal emails regarding joint letter to court (0.3); review document productions for indemnification clause relating to copyright claims (0.4); exchange internal emails regarding request for production no. 28 and API agreements (0.1).	R. BENYAMIN	0.80	220.00
10/15/22	Revise and provide notes to supplement rebuttal expert report material (2.8); draft cover note with questions and thoughts for clarification (0.3).	E. LACKMAN	3.10	1,596.50





Shutterstock, Inc.  
350 Fifth Avenue  
New York, NY 10118  
Ebill through CounselGo

Atty No.: 00750  
Client ID: 50744-00009  
Invoice: 459045

November 17, 2022  
Page 15

10/17/22	[REDACTED] [REDACTED] conference with S. Heck regarding approach to open items in expert report (1.3); review and revise supplemental memo of law on deposition transcripts (2.0); review and edit updated expert report (2.2).	E. LACKMAN	5.80	2,987.00
10/17/22	Prepare documents for production, bates number documents for production, circulate, upload to ftp for service and organize production folders (1.0)	E. MOSES	1.00	150.00
10/17/22	Meet and Confer with Doniger/Burroughs regarding deficiencies and case management order.	E. NGUYEN	0.40	110.00
10/17/22	Serve supplemental production to opposing counsel. (0.2); Emails and follow up with Eleanor Lackman regarding supplemental briefing and draft and revise brief. (0.5); Address issues relating to supplemental production of documents to opposing counsel. (0.2); Draft and revise supplemental briefing to incorporate Eleanor Lackman's comments relating to motion to compel. (1.1)	E. NGUYEN	2.00	550.00





Shutterstock, Inc.  
350 Fifth Avenue  
New York, NY 10118  
Ebill through CounselGo

Atty No.: 00750  
Client ID: 50744-00009  
Invoice: 459045

November 17, 2022  
Page 16

10/17/22	Review emails from E. Lackman to S. Heck regarding rebuttal report (0.2); review investigation report regarding Hane Street (0.1); attend meet and confer call with L. Zaharia regarding joint letter to court (0.2).	R. BENYAMIN	0.50	137.50
10/18/22	Review and comment on court-ordered joint letter (0.3); review and revise court-ordered brief on production of deposition transcripts (0.8); review and revise Heck report (0.9); skim Maddrey rebuttal report (0.3).	E. LACKMAN	2.30	1,184.50



Shutterstock, Inc.  
 350 Fifth Avenue  
 New York, NY 10118  
 Ebill through CounselGo

Atty No.: 00750  
 Client ID: 50744-00009  
 Invoice: 459045

November 17, 2022  
 Page 17

10/18/22	<p>Draft and revise supplemental brief to address additional issues, emails with Eleanor Lackman and finalize for filing. (0.8); Review supplemental briefing from opposing counsel submitted; email with Eleanor Lackman on strategy and modification to draft brief to address issues. (0.4); Emails with Eleanor Lackman about strategy on filing timing for joint letter and supplemental briefing; file the same. (0.5); Draft and revise joint letter to address redaction log issue. (0.2); Draft and revise joint letter to incorporate updates on meet and confer and updates on discovery issues based on recent productions. (0.4); Finalize, proof and arrange for filing of supplemental brief per Judge Woods' order. (1.3); Draft and revise supplemental opposition to address remaining comments from Eleanor Lackman; investigate on open issues and revise accordingly; review transcripts from Itasca and exhibits. (1.7); Emails to opposing counsel regarding outstanding issues joint letter to Judge Woods per his order. (0.2)</p>	E. NGUYEN	5.50	1,512.50
----------	---	-----------	------	----------

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]



Shutterstock, Inc.  
350 Fifth Avenue  
New York, NY 10118  
Ebill through CounselGo

Atty No.: 00750  
Client ID: 50744-00009  
Invoice: 459045

November 17, 2022  
Page 18

10/18/22	Review rebuttal expert report of S. Heck (0.3); draft "documents reviewed" section of rebuttal report and insert citations (1.1); review redline of rebuttal report and accept changes (0.4); emails with E. Lackman, A. Raff, and S. Heck regarding rebuttal report (0.2); finalize rebuttal report and serve (0.3).	R. BENYAMIN	2.30	632.50
10/19/22	Review Maddrey rebuttal report and concurrently draft detailed memo to S. Heck regarding factual items to address in Maddrey deposition and points to prepare for in response (1.4).	E. LACKMAN	1.30	669.50
10/24/22	Emails to Eleanor Lackman regarding expert deposition strategy.	E. NGUYEN	0.10	27.50
10/25/22	Follow-up email to Flickr regarding subpoena. (0.1); Email to opposing counsel regarding deposition of Maddrey. (0.1); Emails with Eleanor Lackman regarding expert deposition strategy. (0.2)	E. NGUYEN	0.40	110.00
10/25/22	Exchange internal emails regarding Maddrey deposition (0.1).	R. BENYAMIN	0.10	27.50
10/26/22	Review expert reports in advance of expert depositions and analyze.	E. NGUYEN	1.10	302.50
10/27/22	Serve expert deposition notice to opposing counsel and arrange for reporter. (0.2); Draft and revise deposition notice to Maddrey. (0.3)	E. NGUYEN	0.50	137.50





Shutterstock, Inc.  
350 Fifth Avenue  
New York, NY 10118  
Ebill through CounselGo

Atty No.: 00750  
Client ID: 50744-00009  
Invoice: 459045

November 17, 2022  
Page 19

10/27/22	Review and exchange internal emails regarding expert depositions (0.2).	R. BENYAMIN	0.20	55.00
10/28/22	Prepare memo to team regarding steps and approaches for expert witness prep, defense, and taking (0.8).	E. LACKMAN	0.80	412.00
10/28/22	Team emails regarding strategy relating to expert depositions.	E. NGUYEN	0.20	55.00
10/28/22	Review email from E. Lackman regarding expert deposition prep (0.2).	R. BENYAMIN	0.20	55.00
10/31/22	Outline expert deposition issues for expert deposition prep.	E. NGUYEN	0.70	192.50
10/31/22	Review court docket to determine outstanding issues relating to discovery and deadlines in advance of expert depositions and summary judgment scheduling.	E. NGUYEN	0.40	110.00

Total Fees:

\_\_\_\_\_



Shutterstock, Inc.  
 350 Fifth Avenue  
 New York, NY 10118  
 Ebill through CounselGo

Atty No.: 00750  
 Client ID: 50744-00009  
 Invoice: 459045

November 17, 2022  
 Page 20

**Billing Summary**

<u>Name</u>	<u>Hours</u>	<u>Rate</u>	<u>Fees</u>
E. LACKMAN	[REDACTED] hours at	\$515.00 =	[REDACTED]
R. BENYAMIN	[REDACTED] hours at	\$275.00 =	
E. NGUYEN	[REDACTED] hours at	\$275.00 =	
[REDACTED]	[REDACTED]	[REDACTED]	
[REDACTED]	[REDACTED]	[REDACTED]	
D. KNISS	[REDACTED] hours at	\$150.00 =	[REDACTED]
E. MOSES	[REDACTED] hours at	\$150.00 =	
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]

**Costs Advanced and In-House Services:**

[REDACTED]	[REDACTED]
Total Costs:	[REDACTED]
Total Fees & Costs:	[REDACTED]



**MITCHELL SILBERBERG & KNUPP LLP**  
A LAW PARTNERSHIP INCLUDING PROFESSIONAL CORPORATIONS

Shutterstock, Inc.  
350 Fifth Avenue  
New York, NY 10118  
Ebill through CounselGo

Atty No.: 00750  
Client ID: 50744-00009  
Invoice: 459045

November 17, 2022

---

**REMITTANCE**  
(please include with payment)

---

**Total Current Charges - This Invoice:**



**Please remit to:**

Mitchell Silberberg & Knupp LLP  
2049 Century Park East, 18th Floor  
Los Angeles, CA 90067

**Wire/ACH Transfer Instructions:**

Routing Number or ABA: 121000248  
Bank Name: Wells Fargo Bank, N.A.  
Bank Address: 420 Montgomery, San Francisco, CA 94104  
Beneficiary Account No.: 4159349430  
Beneficiary Account Name: Mitchell Silberberg & Knupp LLP  
For International Transfers for payments in USD: Swift BIC WFBIUS6S  
For International Transfers for payments in currencies other than USD: Swift BIC WFBIUS6WFFX  
For payment inquiries please e-mail [payment@msk.com](mailto:payment@msk.com)

\*\*\* Please Include Invoice Number with Payment \*\*\*

Note that MSK will not change its banking information without prior notice on our bills. All MSK emails originate from a [3 initials]@msk.com address. Phishing and fraud attempts are common, especially those requesting that you send payment to a new account that does not match our bills. Please don't hesitate to call if you ever have any doubt about the authenticity of any communication.





**MITCHELL SILBERBERG & KNUPP LLP**  
A LAW PARTNERSHIP INCLUDING PROFESSIONAL CORPORATIONS

Shutterstock, Inc.  
350 Fifth Avenue  
New York, NY 10118  
Ebill through CounselGo

Atty No.: 00750  
Client ID: 50744-00009  
Invoice: 459984

December 11, 2022

**LEGAL SERVICES RENDERED** through November 30, 2022

Re: ads. Elliot McGucken  
Disbursements and charges per attached

[REDACTED]  
[REDACTED]  
[REDACTED]

Subtotal - current charges:



Shutterstock, Inc.  
350 Fifth Avenue  
New York, NY 10118  
Ebill through CounselGo

Atty No.: 00750  
Client ID: 50744-00009  
Invoice: 459984

December 11, 2022  
Page 2

**ads. Elliot McGucken**

**Fees through November 30, 2022:**

11/01/22	Email to Heather Shimmin regarding Errata pages for her transcript. (0.1); Emails to Eleanor Lackman and expert Steve Heck regarding expert deposition prep. (0.1)	E. NGUYEN	0.20	55.00
11/01/22	Analyze strategy for preparation of expert depositions (0.3).	R. BENYAMIN	0.30	82.50
11/02/22	Emails to Heather Shimmin and Alexandra Zusman regarding Erratas (0.2); emails to Eleanor Lackman regarding deadline for erratas (0.1); email to counsel regarding extension on erratas (0.1); Draft and revise Heather Shimmin Errata (0.8).	E. NGUYEN	1.20	330.00
11/02/22	Review and analyze emails from E. Lackman regarding preparation for expert depositions (0.5); research regarding Federal Rule of Civil Procedure 702 and Daubert standard for expert testimony (0.7); research, review and analyze sample motions in limine regarding experts in copyright cases (1.6).	R. BENYAMIN	2.80	770.00
11/03/22	Review and update errata sheet entries (1.1)	D. KNISS	1.10	165.00



Shutterstock, Inc.  
350 Fifth Avenue  
New York, NY 10118  
Ebill through CounselGo

Atty No.: 00750  
Client ID: 50744-00009  
Invoice: 459984

December 11, 2022  
Page 3

11/03/22	Review and comment on Shimmin errata sheet (0.3).	E. LACKMAN	0.30	154.50
11/03/22	Email to Heather Shimmin regarding deadline for Errata. (0.1); Prepare for court conference before Judge Woods scheduled for November 7, 2022, including reviewing e-filed documents reference in the scheduling order and evaluate any open issues. (1.6); Meeting with Rebecca Benyamin on expert deposition preparations for Maddrey and Heck. (0.8); Draft and revise Errata Sheet for Heather Shimmin. (0.2)	E. NGUYEN	2.70	742.50
11/03/22	Telephone conference with E. Nyugen regarding preparation for expert depositions (0.6); review, analyze and comment on expert report of T. Maddrey (2.2).	R. BENYAMIN	2.80	770.00
11/04/22	Review notes in preparation for hearing and concurrently update hearing outline.	E. LACKMAN	0.50	257.50
11/04/22	Review resume of T. Maddrey, and draft deposition outline sections on qualifications and prior testimony (2.8).	R. BENYAMIN	2.80	770.00
11/06/22	Draft and revise court conference prep for appearance before Judge Woods on November 7, 2022.	E. NGUYEN	0.40	110.00
11/07/22	Review deposition transcripts and update errata sheets (2)	D. KNISS	2.00	300.00





Shutterstock, Inc.  
 350 Fifth Avenue  
 New York, NY 10118  
 Ebill through CounselGo

Atty No.: 00750  
 Client ID: 50744-00009  
 Invoice: 459984

December 11, 2022  
 Page 4

11/07/22	Clean up notes for hearing (0.7); participate in hearing on discovery and scheduling issues (1.5); draft notes and guidance for sanctions motion (0.7); review and comment on updated edits to H. Shimmin errata sheet (0.3).	E. LACKMAN	3.20	1,648.00
11/07/22	Review court transcript from conference before Judge Woods. (0.3); Emails with Alexandra Zusman regarding Errata, prepare Errata and finalize and serve. (0.4); Conference before Judge Woods regarding discovery disputes and supplemental briefing on motion to compel. (1.4); Emails with Dalton Kniss and review Shimmin Errata, send to Shimmin for signature (0.4)	E. NGUYEN	2.50	687.50
11/07/22	Review and analyze T. Maddrey publications to prepare for expert deposition (1.4); draft questions for deposition outline of T. Maddrey regarding actual damages calculations (3.7); review and analyze supplemental expert report of T. Maddrey (1.2); review email from E. Lackman regarding motion for sanctions (0.1).	R. BENYAMIN	6.40	1,760.00



Shutterstock, Inc.  
 350 Fifth Avenue  
 New York, NY 10118  
 Ebill through CounselGo

Atty No.: 00750  
 Client ID: 50744-00009  
 Invoice: 459984

December 11, 2022  
 Page 5

11/08/22	Email to Eleanor Lackman regarding strategy of deficiency letters relating to discovery and outstanding issues. (0.2); Emails with Rebecca Benyamin regarding strategy relating to expert depositions. (0.1); Draft and revise motion for sanctions relating to privilege log. (5.2)	E. NGUYEN	5.50	1,512.50
11/08/22	Review T. Maddrey CV and various documents mentioned in CV, and draft questions for T. Maddrey deposition regarding qualifications and professional background (1.4); review and analyze quality arguments in T. Maddrey expert report, and draft deposition questions regarding same (0.7).	R. BENYAMIN	2.10	577.50
11/09/22	Draft and revise sanctions motion. (1.4); Emails with Rebecca Benyamin regarding Maddrey deposition prep. (0.2)	E. NGUYEN	1.60	440.00
11/09/22	Emails with E. Nyugen regarding T. Maddrey deposition outline (0.1); review and analyze S. Heck rebuttal report, and prepare questions for T. Maddrey deposition outline (5.8); prepare email to S. Heck regarding comments on T. Maddrey rebuttal report (0.8).	R. BENYAMIN	6.70	1,842.50
11/10/22	Draft and review motion for sanctions.	E. NGUYEN	5.70	1,567.50



Shutterstock, Inc.  
 350 Fifth Avenue  
 New York, NY 10118  
 Ebill through CounselGo

Atty No.: 00750  
 Client ID: 50744-00009  
 Invoice: 459984

December 11, 2022  
 Page 6

11/10/22	Review and analyze rebuttal report of T. Maddrey, and identify key issues to include in deposition outline (1.5); draft questions for deposition outline of T. Maddrey regarding purpose of watermarks (0.8).	R. BENYAMIN	2.30	632.50
11/11/22	Review and revise full brief on privilege sanctions (3.9).	E. LACKMAN	3.90	2,008.50
11/11/22	Draft notice of motion for sanctions. (0.3); Draft and revise Lackman Declaration and Nguyen Declarations in support of motion for sanctions. (2.5); Email to counsel for Flickr regarding subpoena. (0.1); Review potentially confidential exhibits and prepare to send to opposing counsel for consent to publicly file; emails to counsel and Eleanor Lackman. (0.4); Draft and revise preliminary statement to motion for sanctions, revise brief sections. (1.9)	E. NGUYEN	5.20	1,430.00
11/12/22	Review and revise Nguyen declaration (0.4); review and revise Lackman declaration (0.7); review and revise notice of motion (0.1).	E. LACKMAN	1.20	618.00
11/13/22	Review and analyze S. Heck expert report, and comment on areas for deposition preparation (2.4); create outline for deposition prep session of S. Heck regarding background questions and deposition basics (1.5).	R. BENYAMIN	3.90	1,072.50





Shutterstock, Inc.  
 350 Fifth Avenue  
 New York, NY 10118  
 Ebill through CounselGo

Atty No.: 00750  
 Client ID: 50744-00009  
 Invoice: 459984

December 11, 2022  
 Page 7

11/14/22	Review questions on memo of law and respond on same (0.7); review updated declarations and comment on same (0.4); prep meeting with S. Heck (1.1); review Maddrey report and prepare comments regarding same for Maddrey deposition and update outline per same (0.9).	E. LACKMAN	3.10	1,596.50
11/14/22	Retrieve and format and organize in witness file Maddrey Press release (0.2); review deposition transcript formats and email R. Benyamin regarding no text files (0.1)	E. MOSES	0.30	45.00
11/14/22	Review final brief; check TOA and TOC, review redline of citation check from Nicole Williams; check revisions; finalize brief and arrange for filing. (1.9); Shepardize cases cited in motion for sanctions; send brief to Nicole Williams for full cite check and proofing. (2.2); Draft and revise motion for sanctions to incorporate additional comments from Eleanor Lackman. (0.6); Email to opposing counsel regarding motion for sanctions and additional transcript exhibits marked as confidential for public filing. (0.2); Emails to Eleanor Lackman regarding strategy for motion for sanctions; outstanding issues to address in motion for sanctions. (0.3); Draft and revise motion for sanctions. (1.7)	E. NGUYEN	6.90	1,897.50



Shutterstock, Inc.  
 350 Fifth Avenue  
 New York, NY 10118  
 Ebill through CounselGo

Atty No.: 00750  
 Client ID: 50744-00009  
 Invoice: 459984

December 11, 2022  
 Page 8

[REDACTED]				
11/14/22	Video conference with E. Lackman and S. Heck regarding T. Maddrey rebuttal report (1.0); email E. Moses regarding web capture for deposition of T. Maddrey (0.1); collect and organize potential exhibits for deposition of T. Maddrey (0.6); exchange emails with E. Nyugen regarding plaintiff's production of cease and desist letters and communications with licensees (0.1); review articles in T. Maddrey list of publications, and draft questions for T. Maddrey deposition on publications and experience (1.3); review and analyze T. Maddrey rebuttal report, and draft questions for T. Maddrey deposition on opinions regarding metadata, watermarks, and API (2.7); draft questions for T. Maddrey deposition about review process and onboarding (3.0); assemble exhibits for deposition of T. Maddrey (0.6); prepare questions for S. Heck deposition prep session (2.3).	R. BENYAMIN	11.70	3,217.50
11/15/22	Review and revise outline for Maddrey deposition (2.6).	E. LACKMAN	2.60	1,339.00
11/15/22	Prepare twitter document for Maddrey expert witness file and circulate and organize same (0.2); email to E. Nguyen regarding deposition format required for textmap and contacting reporter (0.1)	E. MOSES	0.30	45.00





Shutterstock, Inc.  
350 Fifth Avenue  
New York, NY 10118  
Ebill through CounselGo

Atty No.: 00750  
Client ID: 50744-00009  
Invoice: 459984

December 11, 2022  
Page 9

11/15/22	Meet and confer with opposing counsel regarding summary judgment schedule. (0.3); Prepare for expert deposition of Maddrey; review expert reports and rebuttal reports, annotate, draft and revise outline; review and add potential exhibits. (6.6); Email to opposing counsel with link to Maddrey Deposition. (0.1)	E. NGUYEN	7.00	1,925.00
11/15/22	Prepare questions for S. Heck deposition prep session (1.0); telephone conference with L. Zaharia and E. Nyugen regarding scheduling of opening briefs for summary judgment (0.1); draft questions for T. Maddrey deposition outline regarding damages assessment (2.1); review and analyze comments from E. Lackman on T. Maddrey deposition outline, and revise same (1.9); search Getty Images and input calculations to determine various licensing fees under rights managed model (1.1); assemble exhibits for T. Maddrey deposition (0.3).	R. BENYAMIN	6.50	1,787.50
11/16/22	Manage and maintain deposition exhibits (.2)	D. KNISS	0.20	30.00
11/16/22	Update deposition prep outline for S. Heck.	E. LACKMAN	4.80	2,472.00



Shutterstock, Inc.  
350 Fifth Avenue  
New York, NY 10118  
Ebill through CounselGo

Atty No.: 00750  
Client ID: 50744-00009  
Invoice: 459984

December 11, 2022  
Page 10

11/16/22	Post-deposition call with Eleanor Lackman regarding deposition of Thomas Maddrey. (0.6); Deposition of Thomas Maddrey. (8.5); Prepare for and draft and revise outline for Maddrey deposition. (2.8)	E. NGUYEN	11.90	3,272.50
11/16/22	Finalize exhibits for T. Maddrey deposition, and address E. Nyugen comments (1.3); second-chair deposition of T. Maddrey (7.3); telephone conference with E. Lackman and E. Nyugen regarding debrief of T. Maddrey deposition (0.5); organize and arrange folder of deposition exhibits (0.2); review outline for S. Heck deposition prep session (0.5); review S. Heck expert report and rebuttal report, and prepare additional questions for deposition prep outline (0.7); organize documents for S. Heck deposition prep session (0.3).	R. BENYAMIN	10.80	2,970.00
11/17/22	Deposition preparation with S. Heck (4.0).	E. LACKMAN	4.00	2,060.00
11/17/22	Telephone call to Atkinson Baker reporter regarding fees for certified copies of Shimmin and Zusman, review deposition transcripts for Shimmin and Zusman and email to team regarding locked status and inability to print and costs from court reporter to obtain certified electronic copies (0.8); email to TSG regarding access to deposition files (0.1)	E. MOSES	0.90	135.00





Shutterstock, Inc.  
350 Fifth Avenue  
New York, NY 10118  
Ebill through CounselGo

Atty No.: 00750  
Client ID: 50744-00009  
Invoice: 459984

December 11, 2022  
Page 11

11/17/22	Attend S. Heck deposition prep session (3.7); upload deposition exhibits to TSG (0.1); prepare email to S. Heck regarding documents to review (0.5).	R. BENYAMIN	4.30	1,182.50
11/21/22	Review Maddrey rough draft to highlight any issues for Heck deposition preparations. (1.3); Review opposition to motion for sanctions, exhibits and declarations. (1.3)	E. NGUYEN	2.60	715.00
11/22/22	Defend deposition of S. Heck (3.9).	E. LACKMAN	3.90	2,008.50
11/22/22	Deposition of Steven Heck. (1.0); Draft and revise reply to motion for sanctions; annotate opposition brief and check cases cited by opposing counsel. (1.7)	E. NGUYEN	2.70	742.50
11/22/22	Meeting with E. lackman to debrief deposition of S. Heck (0.2); exchange internal emails regarding deadline to file pre-motion letters for summary judgment (0.2); review email from D. Alexopoulos regarding SmugMug subpoena (0.1).	R. BENYAMIN	0.50	137.50
11/23/22	Call with Flickr counsel regarding subpoena response (0.7); review and revise pre-motion letter on summary judgment (0.6); review incoming letter from plaintiff's counsel on requested motion (0.4).	E. LACKMAN	1.70	875.50
11/23/22	Draft and revise pre-motion for summary judgment letter to incorporate comments from Eleanor Lackman.	E. NGUYEN	0.20	55.00



Shutterstock, Inc.  
350 Fifth Avenue  
New York, NY 10118  
Ebill through CounselGo

Atty No.: 00750  
Client ID: 50744-00009  
Invoice: 459984

December 11, 2022  
Page 12

11/23/22	Draft and revise reply in further support of motion for sanctions. (2.2); Draft and revise pre-motion letter for summary judgment. (1.9); Check scheduling orders to determine deadline for filing pre-motion letters for summary judgment. (0.2)	E. NGUYEN	4.30	1,182.50
11/23/22	Review and analyze emails regarding pre-motion letter to Judge Woods regarding summary judgment (0.2); review letter from L. Zaharia to Judge Woods regarding summary judgment briefing schedule (0.2); exchange internal emails regarding SmugMug subpoena (0.1).	R. BENYAMIN	0.50	137.50
11/24/22	Review and comment on outline for reply to opposition brief including adding additional points to respond to opposition arguments (0.8).	E. LACKMAN	0.80	412.00
11/25/22	Review and comment on outline for reply to opposition brief including adding additional points to respond to opposition arguments (0.8).	E. LACKMAN	0.80	412.00
11/25/22	E-file pre-motion letter for summary judgment.	E. NGUYEN	0.20	55.00
11/27/22	Draft and revise reply memo in further support of motion for sanctions.	E. NGUYEN	1.40	385.00
11/28/22	Review joint letter and concurrently input responses (0.4); review and revise reply brief (0.4).	E. LACKMAN	0.80	412.00





Shutterstock, Inc.  
 350 Fifth Avenue  
 New York, NY 10118  
 Ebill through CounselGo

Atty No.: 00750  
 Client ID: 50744-00009  
 Invoice: 459984

December 11, 2022  
 Page 13

11/28/22	Review links to contributor guidelines and test convert to pdf and email to help desk for forensic captures (0.2); organize third party production and communications in litigation support folder (0.2)	E. MOSES	0.40	60.00
11/28/22	Draft and revise reply in further support of motion for sanctions.	E. NGUYEN	5.90	1,622.50
11/28/22	Review Flickr documents (0.2); review notes from E. Lackman regarding call with Flickr (0.1).	R. BENYAMIN	0.30	82.50
11/29/22	Continue to review and revise reply brief on motion for sanctions (0.9); review and comment on Lackman declaration and updated reply brief (0.6).	E. LACKMAN	1.50	772.50
11/29/22	Prepare and revise production of documents and organize production folder	E. MOSES	0.40	60.00
11/29/22	Email to Andrew Raff regarding reply brief in further support of motion for sanctions. (0.1); Draft and revise reply motion for sanctions to incorporate comments from Eleanor Lackman. (1.3); Draft and revise Lackman Declaration in further support of motion for sanctions. (0.2)	E. NGUYEN	1.60	440.00





Shutterstock, Inc.  
 350 Fifth Avenue  
 New York, NY 10118  
 Ebill through CounselGo

Atty No.: 00750  
 Client ID: 50744-00009  
 Invoice: 459984

December 11, 2022  
 Page 14

11/29/22	Prepare Flickr documents for production (0.3); exchange internal emails regarding confidentiality designations for Flickr documents (0.2); review draft production of Flickr documents, and serve on opposing counsel (0.2).	R. BENYAMIN	0.70	192.50
11/30/22	Manage and maintain deposition transcripts and exhibits (.3); Manage and maintain document productions (.4)	D. KNISS	0.70	105.00
11/30/22	Provide final feedback on reply brief pertaining to supplementation argument.	E. LACKMAN	0.20	103.00
11/30/22	Cite check, proof, finalize and arrange for filing for reply brief in further support of motion for sanctions.	E. NGUYEN	1.50	412.50
11/30/22	Proofread reply brief in support of motion for sanctions regarding privilege log (0.8).	R. BENYAMIN	0.80	220.00

Total Fees:





Shutterstock, Inc.  
 350 Fifth Avenue  
 New York, NY 10118  
 Ebill through CounselGo

Atty No.: 00750  
 Client ID: 50744-00009  
 Invoice: 459984

December 11, 2022  
 Page 15

### **Billing Summary**

<u>Name</u>	<u>Hours</u>	<u>Rate</u>	<u>Fees</u>
E. LACKMAN	[REDACTED] hours at	\$515.00 =	[REDACTED]
R. BENYAMIN	[REDACTED] hours at	\$275.00 =	
E. NGUYEN	[REDACTED] hours at	\$275.00 =	
D. KNISS	[REDACTED] hours at	\$150.00 =	
[REDACTED]	[REDACTED]	[REDACTED]	
E. MOSES	[REDACTED] hours at	\$150.00 =	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	

### **Costs Advanced and In-House Services:**

11/16/22	Deposition/Video of Videograph - Elliot McGucken , 9/28/2022 - TSG REPORTING	1,150.00
11/16/22	Deposition/Video of Video Recording - Elliot McGucken, 9/28/22 - TSG REPORTING	3,839.40
	Total Costs:	[REDACTED]
	Total Fees & Costs:	[REDACTED]



**MITCHELL SILBERBERG & KNUPP LLP**  
A LAW PARTNERSHIP INCLUDING PROFESSIONAL CORPORATIONS

Shutterstock, Inc.  
350 Fifth Avenue  
New York, NY 10118  
Ebill through CounselGo

Atty No.: 00750  
Client ID: 50744-00009  
Invoice: 459984

December 11, 2022

## REMITTANCE

(please include with payment)

Current Fees:

Current Disbursements:

**Total Current Charges - This Invoice:**

Prior balance due:

**TOTAL DUE:**

**Please remit to:**

Mitchell Silberberg & Knupp LLP  
2049 Century Park East, 18th Floor  
Los Angeles, CA 90067

**Wire/ACH Transfer Instructions:**

Routing Number or ABA: 121000248  
Bank Name: Wells Fargo Bank, N.A.  
Bank Address: 420 Montgomery, San Francisco, CA 94104  
Beneficiary Account No.: 4159349430  
Beneficiary Account Name: Mitchell Silberberg & Knupp LLP  
For International Transfers for payments in USD: Swift BIC WFBIUS6S  
For International Transfers for payments in currencies other than USD: Swift BIC WFBIUS6WFFX  
For payment inquiries please e-mail [payment@msk.com](mailto:payment@msk.com)

\*\*\* Please Include Invoice Number with Payment \*\*\*

Note that MSK will not change its banking information without prior notice on our bills. All MSK emails originate from a [3 initials]@msk.com address. Phishing and fraud attempts are common, especially those requesting that you send payment to a new account that does not match our bills. Please don't hesitate to call if you ever have any doubt about the authenticity of any communication.





**MITCHELL SILBERBERG & KNUPP LLP**  
A LAW PARTNERSHIP INCLUDING PROFESSIONAL CORPORATIONS

Shutterstock, Inc.  
350 Fifth Avenue  
New York, NY 10118  
Ebill through CounselGo

Atty No.: 00750  
Client ID: 50744-00009  
Invoice: 461830

January 24, 2023

**LEGAL SERVICES RENDERED** through December 31, 2022

Re: ads. Elliot McGucken  
Disbursements and charges per attached

[REDACTED]

[REDACTED]

---

[REDACTED]

TOTAL DUE:



Shutterstock, Inc.  
350 Fifth Avenue  
New York, NY 10118  
Ebill through CounselGo

Atty No.: 00750  
Client ID: 50744-00009  
Invoice: 461830

January 24, 2023  
Page 2

**ads. Elliot McGucken**

**Fees through December 31, 2022:**

12/02/22	Review notes from E. Lackman regarding summary judgment motions (0.1); search for and collect E. Lackman notes on Steinmetz's opposition (0.2); prepare task list for summary judgment motion (0.1).	R. BENYAMIN	0.40	110.00
12/04/22	Draft outline for motion for summary judgment (1.2); draft up thoughts from Wareka and Steinmetz conference for inclusion as part of strategy on motion for summary judgment (0.4).	E. LACKMAN	1.60	824.00
12/05/22	Manage and maintain document production (.1)	D. KNISS	0.10	15.00
12/05/22	Meeting with Marissa Lewis and Rebecca Benyamin regarding motion for summary judgment.	E. NGUYEN	0.50	137.50

[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]



Shutterstock, Inc.  
350 Fifth Avenue  
New York, NY 10118  
Ebill through CounselGo

Atty No.: 00750  
Client ID: 50744-00009  
Invoice: 461830

January 24, 2023  
Page 3

12/06/22	Review and maintain data collections and records (.1)	D. KNISS	0.10	15.00
12/06/22	Prepare for court conference (0.5); participate in same (1.5); strategy meeting with team regarding approach on summary judgment motion and motion in limine (0.6).	E. LACKMAN	2.60	1,339.00
12/06/22	Meeting with Marissa Lewis and Rebecca Benyamin regarding motion for summary judgment. (0.7); Status Conference before Judge Woods. (1.3)	E. NGUYEN	2.00	550.00
	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
12/07/22	Update Shutterstock production index and emails with R. Benyamin regarding case organization and motion for summary judgment	E. MOSES	1.00	150.00
12/07/22	Multiple emails with E. Moses regarding summary judgment motion and updating document production index (0.2);	R. BENYAMIN	0.20	55.00





Shutterstock, Inc.  
350 Fifth Avenue  
New York, NY 10118  
Ebill through CounselGo

Atty No.: 00750  
Client ID: 50744-00009  
Invoice: 461830

January 24, 2023  
Page 4

12/08/22	Index shutterstock productions and circulate updated index	E. MOSES	1.00	150.00
12/08/22	Review updated production index (0.1); review expert report of S. Heck, and prepare declaration of S. Heck in support of summary judgment motion (0.9).	R. BENYAMIN	1.00	275.00
12/12/22	Review email from E. Lackman regarding schedule for summary judgment motion (0.1); draft declaration of S. Heck in support of summary judgment motion (0.9).	R. BENYAMIN	1.00	275.00
	[REDACTED]			
12/13/22	Draft declaration of S. Heck in support of summary judgment motion (1.3); collect and assemble potential exhibits for summary judgment motion (0.8).	R. BENYAMIN	2.10	577.50
12/14/22	Review expert report of S. Heck on metadata, and continue to draft declaration of S. Heck in support of summary judgment motion (0.8); review rule 56.1 statement to identify documents to collect as exhibits for summary judgment motion (0.2).	R. BENYAMIN	1.00	275.00
12/15/22	Review BMG v. Likee case (0.1).	R. BENYAMIN	0.10	27.50

January 24, 2023  
Page 5

\_\_\_\_\_

\_\_\_\_\_

12/21/22	Review data and strategize with R. Benyamin regarding image ids identified and information needed for summary judgment motion and oversee comparison of Image IDs identified in Complaint and First Amended Complaint	E. MOSES	1.00	150.00
----------	---	----------	------	--------



Shutterstock, Inc.  
350 Fifth Avenue  
New York, NY 10118  
Ebill through CounselGo

Atty No.: 00750  
Client ID: 50744-00009  
Invoice: 461830

January 24, 2023  
Page 6

12/21/22	Review and analyze document productions and exhibits to complaint to determine timeline of events for summary judgment motion, and fill out chart regarding same (1.5); search for Bates numbers of key documents and evidence for summary judgment motion, and fill out chart regarding same (1.6); telephone conference with E. Moses regarding document productions and preparation of spreadsheets for images and licenses (1.0).	R. BENYAMIN	4.10	1,127.50
12/22/22	Review briefing in preparation for hearing on motion and concurrently outline points for same (2.0).	E. LACKMAN	2.00	1,030.00
12/22/22	Email project assistant regarding summary judgment exhibit project	E. MOSES	0.10	15.00
12/22/22	Review and analyze document productions, and continue to fill out charts regarding timeline of events and key documents for summary judgment motion (1.4).	R. BENYAMIN	1.40	385.00
12/23/22	Continue to review briefing in preparation for hearing on motion and concurrently outline points for same (carry over from prior day) (1.0); participate in hearing on sanctions motion (0.9); report to client regarding same (0.2).	E. LACKMAN	2.10	1,081.50





Shutterstock, Inc.  
 350 Fifth Avenue  
 New York, NY 10118  
 Ebill through CounselGo

Atty No.: 00750  
 Client ID: 50744-00009  
 Invoice: 461830

January 24, 2023  
 Page 7

[REDACTED]		[REDACTED]	[REDACTED]	[REDACTED]
12/23/22	Exchange internal emails regarding missing documents (0.2); search for asset IDs for additional images in First Amended Complaint, and prepare email to A. Raff regarding documents to collect (0.7); add Bates numbers for asset detail pages to chart regarding key documents, and prepare email to M. Lewis regarding same (1.2); draft declaration of S. Heck in support of summary judgment motion (0.9); review and analyze spreadsheet regarding McGucken licenses (0.2); exchange emails with M. Lewis regarding preparation of spreadsheets for summary judgment motion (0.3); review exhibit 1 to First Amended Complaint, and prepare spreadsheet with list of asset IDs and copyright registration numbers (1.3).	R. BENYAMIN	4.80	1,320.00
12/27/22	Prepare excel chart of licenses for MSJ motion	E. MOSES	0.40	60.00



Shutterstock, Inc.  
 350 Fifth Avenue  
 New York, NY 10118  
 Ebill through CounselGo

Atty No.: 00750  
 Client ID: 50744-00009  
 Invoice: 461830

January 24, 2023  
 Page 8

12/27/22	Draft and revise declaration of S. Heck in support of summary judgment motion (1.4); exchange emails with E. Moses regarding spreadsheet of licenses (0.2); review spreadsheet of licenses (0.2); review exhibit 1 to First Amended Complaint, and prepare spreadsheet with list of asset IDs, copyright registration numbers, and image upload dates (1.5); review exhibit 2 to First Amended Complaint, and include additional asset IDs to spreadsheet (0.3).	R. BENYAMIN	3.60	990.00
12/28/22	Prepare chart of images at issue for motion for summary judgment	E. MOSES	0.20	30.00



Shutterstock, Inc.  
 350 Fifth Avenue  
 New York, NY 10118  
 Ebill through CounselGo

Atty No.: 00750  
 Client ID: 50744-00009  
 Invoice: 461830

January 24, 2023  
 Page 9

12/28/22	Review email from E. Lackman regarding schedule for summary judgment motion (0.1); prepare redline comparison of S. Heck expert report and S. Heck declaration, and draft email to M. Lewis regarding same (0.3); prepare email to E. Nyugen regarding additional images in First Amended Complaint (0.1); exchange multiple emails with E. Moses regarding formatting of spreadsheets and errata sheet for E. McGucken deposition (0.2); review and analyze licensing fees in license spreadsheet (0.2); review documents, and fill in dates for takedown of images at issue (0.5); review and revise spreadsheets for summary judgment motion, and prepare email to M. Lewis regarding same (1.3).	R. BENYAMIN	2.70	742.50
12/29/22	Exchange internal emails regarding errata sheet for deposition of E. McGucken, and review same (0.6).	R. BENYAMIN	0.60	165.00

Total Fees:







Shutterstock, Inc.  
 350 Fifth Avenue  
 New York, NY 10118  
 Ebill through CounselGo

Atty No.: 00750  
 Client ID: 50744-00009  
 Invoice: 461830

January 24, 2023  
 Page 10

### **Billing Summary**

<u>Name</u>	<u>Hours</u>	<u>Rate</u>	<u>Fees</u>
E. LACKMAN	[REDACTED] hours at	\$515.00 =	[REDACTED]
R. BENYAMIN	[REDACTED] hours at	\$275.00 =	
E. NGUYEN	[REDACTED] hours at	\$275.00 =	
M. LEWIS	[REDACTED] hours at	\$275.00 =	
D. KNISS	[REDACTED] hours at	\$150.00 =	
E. MOSES	[REDACTED] hours at	\$150.00 =	
[REDACTED]	[REDACTED]		

### **Costs Advanced and In-House Services:**

[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]
12/16/22 Deposition/Transcript of Transcript of Thomas Blake Maddrey, 12/17/22	4,215.25
12/16/22 Deposition/Transcript of Thomas Blake Maddrey, 12/7/22	1,318.75

Total Costs:

Total Fees & Costs:

[REDACTED]

[REDACTED]



---

**MITCHELL SILBERBERG & KNUPP LLP**  
A LAW PARTNERSHIP INCLUDING PROFESSIONAL CORPORATIONS

Shutterstock, Inc.  
350 Fifth Avenue  
New York, NY 10118  
Ebill through CounselGo

Atty No.: 00750  
Client ID: 50744-00009  
Invoice: 461830

January 24, 2023



**MITCHELL SILBERBERG & KNUPP LLP**  
A LAW PARTNERSHIP INCLUDING PROFESSIONAL CORPORATIONS

Shutterstock, Inc.  
350 Fifth Avenue  
New York, NY 10118  
Ebill through CounselGo

Atty No.: 00750  
Client ID: 50744-00009  
Invoice: 461830

January 24, 2023

## REMITTANCE

(please include with payment)

Current Fees:

Current Disbursements:

**Total Current Charges - This Invoice:**

---

**Please remit to:**

Mitchell Silberberg & Knupp LLP  
2049 Century Park East, 18th Floor  
Los Angeles, CA 90067

**Wire/ACH Transfer Instructions:**

Routing Number or ABA: 121000248  
Bank Name: Wells Fargo Bank, N.A.  
Bank Address: 420 Montgomery, San Francisco, CA 94104  
Beneficiary Account No.: 4159349430  
Beneficiary Account Name: Mitchell Silberberg & Knupp LLP  
For International Transfers for payments in USD: Swift BIC WFBIUS6S  
For International Transfers for payments in currencies other than USD: Swift BIC WFBIUS6WFFX  
For payment inquiries please e-mail payment@msk.com

\*\*\* Please Include Invoice Number with Payment \*\*\*

Note that MSK will not change its banking information without prior notice on our bills. All MSK emails originate from a [3 initials]@msk.com address. Phishing and fraud attempts are common, especially those requesting that you send payment to a new account that does not match our bills. Please don't hesitate to call if you ever have any doubt about the authenticity of any communication.

☐ I am able to receive future statements via email. Please send them to:

Contact name: \_\_\_\_\_

Email address: \_\_\_\_\_





---

**MITCHELL SILBERBERG & KNUPP LLP**  
A LAW PARTNERSHIP INCLUDING PROFESSIONAL CORPORATIONS

Shutterstock, Inc.  
350 Fifth Avenue  
New York, NY 10118  
Ebill through CounselGo

Atty No.: 00750  
Client ID: 50744-00009  
Invoice: 461830

January 24, 2023



**MITCHELL SILBERBERG & KNUPP LLP**  
A LAW PARTNERSHIP INCLUDING PROFESSIONAL CORPORATIONS

Shutterstock, Inc.  
350 Fifth Avenue  
New York, NY 10118  
Ebill through CounselGo

Atty No.: 00750  
Client ID: 50744-00009  
Invoice: 463316

February 27, 2023

**LEGAL SERVICES RENDERED** through January 31, 2023

Re: ads. Elliot McGucken  
Disbursements and charges per attached

[REDACTED]

[REDACTED]

---

[REDACTED]

Total - current charges:



Shutterstock, Inc.  
350 Fifth Avenue  
New York, NY 10118  
Ebill through CounselGo

Atty No.: 00750  
Client ID: 50744-00009  
Invoice: 463316

February 27, 2023  
Page 2

**ads. Elliot McGucken**

**Fees through January 31, 2023:**

01/02/23	Draft Rule 56.1 statement of facts (3.5); review image details and licensing evidence (0.5); and review expert report and declaration (0.5).	M. LEWIS	4.50	1,687.50
01/03/23	Download FAC additional images from client share file, upload and organize in litigation support folders, bates number for production and upload to ftp to serve	E. MOSES	0.80	120.00
01/03/23	Continue to draft Rule 56.1 statement of facts (2.9); review evidence regarding licenses and copyright registrations (1.5); and confer with R. Benyamin regarding same (1.0).	M. LEWIS	5.40	2,025.00
01/03/23	Review and analyze questions from M. Lewis regarding timeline and key documents, and respond to same (0.9); review additional asset detail pages collected from client (0.6); revise spreadsheet regarding removal of images (0.2); review and analyze email from M. Lewis regarding copyright registrations, and respond to same (1.1); assemble copyright registrations in PSF folder (0.2).	R. BENYAMIN	3.00	825.00
01/04/23	Organize production folders and update index to shutterstock production	E. MOSES	0.30	45.00





Shutterstock, Inc.  
350 Fifth Avenue  
New York, NY 10118  
Ebill through CounselGo

Atty No.: 00750  
Client ID: 50744-00009  
Invoice: 463316

February 27, 2023  
Page 3

01/04/23	Prepare draft email regarding document production of missing asset detail pages (0.2); finalize document production, and prepare email to opposing counsel regarding same (0.2); update spreadsheet of images at issue with Bates numbers of missing asset detail pages (0.3).	R. BENYAMIN	0.70	192.50
01/05/23	Continue to draft Rule 56.1 statement of facts (2.5); review and incorporate evidence (2.0); and draft summary judgment motion (5.6).	M. LEWIS	10.10	3,787.50
01/06/23	Review DMCA agent website and request capture of current agent information and prepare summary judgment exhibit	E. MOSES	0.20	30.00
01/06/23	Team meeting regarding MSJ and Daubert motion. (0.5); Draft and revise McGucken Maddrey Daubert Motion including legal research on standards and qualifications. (6.1); Meeting with Marissa Lewis and Rebecca Benyamin regarding motion for summary judgment strategy. (0.8)	E. NGUYEN	7.40	2,035.00

[REDACTED]



Shutterstock, Inc.  
 350 Fifth Avenue  
 New York, NY 10118  
 Ebill through CounselGo

Atty No.: 00750  
 Client ID: 50744-00009  
 Invoice: 463316

February 27, 2023  
 Page 4

[REDACTED]				
01/08/23	Review and comment on outline for motion in limine.	E. LACKMAN	0.50	257.50
01/08/23	Continue to draft summary judgment motion (5.0); and continue to draft and incorporate evidence into Rule 56.1 statement (4.0).	M. LEWIS	9.00	3,375.00
01/08/23	Review deposition transcript of S. Heck, and prepare errata sheet (1.7); review and analyze expert report and rebuttal report of S. Heck regarding pricing models, and add to declaration in support of summary judgment motion (1.6).	R. BENYAMIN	3.30	907.50

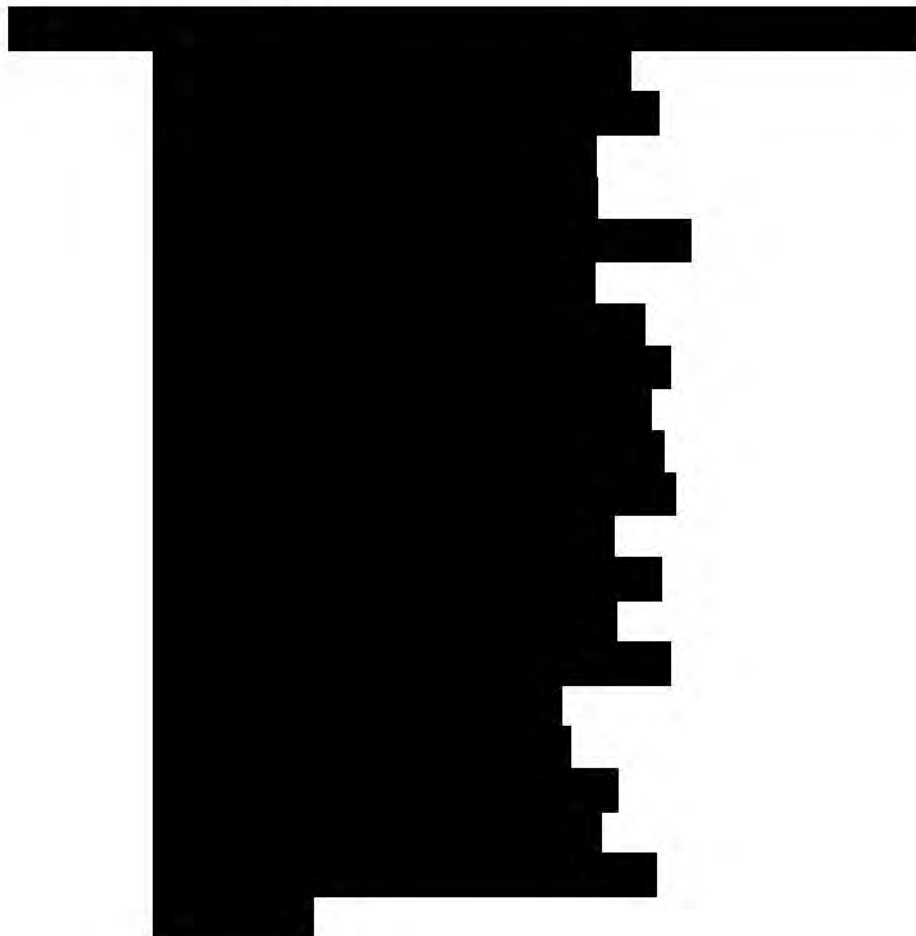


Shutterstock, Inc.  
350 Fifth Avenue  
New York, NY 10118  
Ebill through CounselGo

Atty No.: 00750  
Client ID: 50744-00009  
Invoice: 463316

February 27, 2023  
Page 5

01/09/23	Review errata sheets and advise on approach to clean-up of Heck errata sheet (0.4).	E. LACKMAN	0.40	206.00
01/09/23	Draft and revise Daubert motion to exclude Maddrey.	E. NGUYEN	4.50	1,237.50
01/09/23	Draft client declaration in support of motion for summary judgment (3.5); and review and confer with R. Benyamin regarding expert report and licensing evidence (1.3).	M. LEWIS	4.80	1,800.00







Shutterstock, Inc.  
 350 Fifth Avenue  
 New York, NY 10118  
 Ebill through CounselGo

Atty No.: 00750  
 Client ID: 50744-00009  
 Invoice: 463316

February 27, 2023  
 Page 6

01/10/23	Review and revise motion in limine (0.5).	E. LACKMAN	0.50	257.50
01/10/23	Download client docs and organize in psf (0.1); review Rule 56.1 statement and assemble documents from McGucken production referenced as e exhibits (0.5); prepare deposition excerpts for msj motion (1.0)	E. MOSES	1.60	240.00
01/10/23	Draft and revise motion to exclude Maddrey and send to Eleanor Lackman. (7.7); Review and analyze updated privilege log. (0.3)	E. NGUYEN	8.00	2,200.00
01/10/23	Continue to draft summary judgment motion (3.5) and client declaration (2.5); revise and incorporate evidence into Rule 56.1 statement (2.0); review expert declaration (0.5); and supervise and confer with R. Benyamin regarding edits (0.5).	M. LEWIS	9.00	3,375.00



Shutterstock, Inc.  
 350 Fifth Avenue  
 New York, NY 10118  
 Ebill through CounselGo

Atty No.: 00750  
 Client ID: 50744-00009  
 Invoice: 463316

February 27, 2023  
 Page 7

[REDACTED]				
01/11/23	Continue review and revision of motion in limine against Maddrey (1.2).	E. LACKMAN	1.20	618.00
01/11/23	Summary judgment preparation including reviewing pleadings to determine and retrieve exhibits	E. MOSES	3.00	450.00
01/11/23	Draft and revise motion to exclude Maddrey to update legal research and address comments by Eleanor Lackman.	E. NGUYEN	5.40	1,485.00



Shutterstock, Inc.  
350 Fifth Avenue  
New York, NY 10118  
Ebill through CounselGo

Atty No.: 00750  
Client ID: 50744-00009  
Invoice: 463316

February 27, 2023  
Page 8

01/11/23	Review and draft response to letter regarding page limit.	M. LEWIS	0.60	225.00
01/11/23	Review plaintiff's letter motion for leave to file excess pages (0.1); telephone call with E. Moses regarding assembling exhibits for summary judgment motion (0.1).	R. BENYAMIN	0.20	55.00
01/12/23	Review and revise memo of law on summary judgment (2.7); review and revise updated motion in limine (1.0).	E. LACKMAN	3.70	1,905.50
01/12/23	Prepare exhibits for MSJ and email to team regarding edits to Requests for Admission cited	E. MOSES	0.40	60.00
01/12/23	Draft and revise motion to exclude Daubert to address additional comments from Eleanor Lackman. (2.7); Draft and revise motion to seal and compile documents in support of Daubert Motion to determine what to send to opposing counsel for meet and confer sealing obligations. (4.5)	E. NGUYEN	7.20	1,980.00
01/12/23	Revise summary judgment motion per E. Lackman's comments.	M. LEWIS	2.10	787.50
01/12/23	Review and analyze E. McGucken deposition transcript for citations to include in summary judgment motion (1.5); review emails from M. Lewis and E. Lackman regarding researching legislative history of the DMCA (0.4).	R. BENYAMIN	1.90	522.50





Shutterstock, Inc.  
350 Fifth Avenue  
New York, NY 10118  
Ebill through CounselGo

Atty No.: 00750  
Client ID: 50744-00009  
Invoice: 463316

February 27, 2023  
Page 9

01/13/23	Prepare and review record citations for the motion to exclude (1.5)	D. KNISS	1.50	225.00
01/13/23	Review and revise memo of law on summary judgment (2.7); review and revise updated motion in limine (1.0).	E. LACKMAN	3.70	1,905.50
01/13/23	Strategize with R. Benyamin regarding MSJ preparation (0.4); review deposition folders and contact court reporter to obtain textmap compatible transcripts, download the transcripts to litigation support folder, set up textmap database workspace and upload McGucken and Maddrey depositions to textmap (0.6)	E. MOSES	1.00	150.00
01/13/23	Meeting with Marissa Lewis and Rebecca Benyamin regarding MSJ and Daubert motion. (1.0); Emails with Marissa Lewis and Rebecca Benyamin regarding Daubert Motion and motion to seal, along with documents for confidentiality; review judge's rules on meet and confer and sealing, review protective order. (2.1); Team Meeting with Marissa Lewis and Rebecca Benyamin regarding Daubert Motion and Motion for Summary Judgment. (0.8)	E. NGUYEN	3.90	1,072.50
01/13/23	Continue to revise summary judgment papers per E. Lackman comments (2.5); and meeting with E. Nguyen and R. Benyamin regarding next steps (0.8).	M. LEWIS	3.30	1,237.50



Shutterstock, Inc.  
350 Fifth Avenue  
New York, NY 10118  
Ebill through CounselGo

Atty No.: 00750  
Client ID: 50744-00009  
Invoice: 463316  
  
February 27, 2023  
Page 10

[REDACTED]

01/15/23	Draft letter motion to seal and confer with E. Nguyen regarding same (1.5); draft notice of motion (0.2); and review comments and revise summary judgment motion papers (3.5).	M. LEWIS	5.20	1,950.00
----------	--	----------	------	----------



Shutterstock, Inc.  
350 Fifth Avenue  
New York, NY 10118  
Ebill through CounselGo

Atty No.: 00750  
Client ID: 50744-00009  
Invoice: 463316

February 27, 2023  
Page 11

01/15/23	Review and analyze E. McGucken deposition transcript to include citations for summary judgment motion (4.4); draft letter to Judge Woods regarding request for additional pages for summary judgment moving brief (0.3).	R. BENYAMIN	4.70	1,292.50
01/16/23	Review questions in memo of law and respond to same (0.4); review and revise statement of undisputed facts (1.6); review and revise Shimmin declaration (1.5); review and revise Heck declaration (0.8); review and revise Lackman declaration (0.3).	E. LACKMAN	4.60	2,369.00
01/16/23	Review comments and revise summary judgment motion papers (3.6); review and select documents for exhibits (2.2); identify confidentiality issues (0.6); revise expert declaration and attention to exhibit (0.6); and confer with team regarding status and next steps (1.0).	M. LEWIS	8.00	3,000.00





Shutterstock, Inc.  
350 Fifth Avenue  
New York, NY 10118  
Ebill through CounselGo

Atty No.: 00750  
Client ID: 50744-00009  
Invoice: 463316  
  
February 27, 2023  
Page 12

[REDACTED]

01/17/23	Respond to open questions regarding confidentiality and particular statements of fact (0.8); review and revise request for extension of time (0.5); check motion in limine comments and advise on same (0.5).	E. LACKMAN	1.80	927.00
----------	---	------------	------	--------



Shutterstock, Inc.  
 350 Fifth Avenue  
 New York, NY 10118  
 Ebill through CounselGo

Atty No.: 00750  
 Client ID: 50744-00009  
 Invoice: 463316

February 27, 2023  
 Page 13

01/17/23	MSJ and Daubert preparation including assemble exhibits and deposition testimony for MSJ and Daubert motion, prepare highlighted versions and excerpts of confidential testimony to send to Plaintiff's counsel, multiple emails regarding exhibit and testimony clarification, retrieve new complaint from Westlaw, review registrations to confirm image placement and email to team regarding same; email court reporter for Shimmin transcript and download same to deposition folders	E. MOSES	7.00	1,050.00
01/17/23	Prepare exhibits for Maddrey Daubert motion. (0.8); Draft and revise email to opposing counsel per Judge's rules to meet and confer on confidentiality. (0.5)	E. NGUYEN	1.30	357.50
01/17/23	Review and incorporate comments to summary judgment motion papers and confer with E. Lackman regarding same (3.0); draft attorney declaration (1.5); attention to confidentiality issues (0.5); supervise exhibit collection and cite-checking (1.0); and meeting with R. Benyamin (0.5).	M. LEWIS	6.50	2,437.50



Shutterstock, Inc.  
 350 Fifth Avenue  
 New York, NY 10118  
 Ebill through CounselGo

Atty No.: 00750  
 Client ID: 50744-00009  
 Invoice: 463316

February 27, 2023  
 Page 14

01/17/23	Finish inserting cites to E. McGucken's deposition transcript, and prepare list of excerpts to send to opposing counsel (3.1); video conference with M. Lewis regarding motion for summary judgment (0.5); review expert report of S. Heck and insert relevant cites to Rule 56.1 statement (2.2); review highlighted excerpts of E. McGucken's deposition transcript (1.0), prepare email to opposing counsel regarding filing deposition excerpts and other confidential documents under seal (0.4); multiple emails with M. Lewis regarding motion for summary judgment (0.3); multiple emails with E. Moses regarding assembling exhibits for summary judgment motion (0.2); prepare redlines of summary judgment motion papers, and email A. Raff regarding same (0.6); email S. Heck declaration in support of summary judgment motion (0.1); exchange internal emails regarding docket report, and review docket report of E. McGucken lawsuits (0.3); review spreadsheet regarding exhibits for summary judgment motion (0.3); review and analyze comments from M. Lewis regarding declarations in support of summary judgment motion, and revise same (0.8).	R. BENYAMIN	9.70	2,667.50
----------	---	-------------	------	----------





Shutterstock, Inc.  
 350 Fifth Avenue  
 New York, NY 10118  
 Ebill through CounselGo

Atty No.: 00750  
 Client ID: 50744-00009  
 Invoice: 463316

February 27, 2023  
 Page 15



01/18/23	Review and comment on papers accompanying motion to seal relating to motion in limine (0.7).	E. LACKMAN	0.70	360.50
01/18/23	Upload Shimmin transcript to textmap (0.1); cite-check MSJ brief including running cite-check report, retrieving additional authorities and cite-checking and editing brief (4.0) ; organize MSJ exhibits (0.1)	E. MOSES	4.20	630.00
01/18/23	Emails with team regarding strategy on motion for summary judgment and Daubert motion. (0.4); Draft and revise Lackman declaration, notice of motion, and revisions on motion to seal and send to Eleanor Lackman with analysis. (2.5)	E. NGUYEN	2.90	797.50
01/18/23	Address open citations in summary judgment motion papers (1.5); update letter motion to seal and declarations (0.5); and confer with team on next steps for filing (0.5).	M. LEWIS	2.50	937.50



Shutterstock, Inc.  
350 Fifth Avenue  
New York, NY 10118  
Ebill through CounselGo

Atty No.: 00750  
Client ID: 50744-00009  
Invoice: 463316

February 27, 2023  
Page 16

01/18/23	Research regarding legislative history of the DMCA (1.6); review and analyze captures of similar images to E. McGucken image (1.1);   revise motion for summary judgment to incorporate new lawsuit filed against Shutterstock (0.1); review and analyze lawsuits filed against licensees (0.6).	R. BENYAMIN	3.80	1,045.00
01/19/23	Proof and cite check brief to exclude (3.2)	D. KNISS	3.20	480.00
01/19/23	Advise on various isolated questions pertaining to documents for MSJ and MIL submission.	E. LACKMAN	0.90	463.50
01/19/23	Process Veritext invoice for Shimmin transcript (0.1); cite-check MSJ brief (0.4); prepare updated McGucken transcript excerpts (0.3)	E. MOSES	0.80	120.00



Shutterstock, Inc.  
 350 Fifth Avenue  
 New York, NY 10118  
 Ebill through CounselGo

Atty No.: 00750  
 Client ID: 50744-00009  
 Invoice: 463316

February 27, 2023  
 Page 17

01/19/23	Address factual issues in 56.1 statement. (0.8); Emails with team regarding filing procedure and arrange for filing assistance on MSJ and Daubert. (0.5); Finalize papers and prepare for cite check for Daubert motion. (1.5); Draft and revise Daubert motion to exclude Maddrey. (1.7); Address comments in 56.1 statement and memorandum of law in support of motion for summary judgment; email to Marissa Lewis. (0.8); Call with Eleanor Lackman regarding Daubert Motion and strategy. (0.2)	E. NGUYEN	5.50	1,512.50
01/19/23	Review and incorporate client comments (1.5); revise Rule 56.1 statement and expert declaration (1.5); supervise redactions and cite-checking (1.0); and supervise and coordinate with team on finalizing documents (1.5).	M. LEWIS	5.50	2,062.50






Shutterstock, Inc.  
 350 Fifth Avenue  
 New York, NY 10118  
 Ebill through CounselGo

Atty No.: 00750  
 Client ID: 50744-00009  
 Invoice: 463316

February 27, 2023  
 Page 18

01/19/23	Review and analyze comments from A. Raff regarding summary judgment motion, Rule 56.1 statement, and S. Heck declaration (1.6); capture screenshots of similar images to E. McGucken's image, and assemble exhibit to S. Heck declaration (2.3); review and analyze comments from A. Raff regarding H. Shimmin declaration, and exchange internal emails regarding same (1.4); telephone call with M. Lewis regarding next steps for summary judgment motion (0.1); review and analyze Shutterstock's responses to requests for admission and interrogatories, and insert citations to Rule 56.1 statement (7.1); review emails from A. Raff and E. Lackman regarding Shutterstock's API, and revise section in Rule 56.1 statement regarding same (1.1); multiple emails with M. Lewis regarding next steps for summary judgment motion (0.2); exchange internal emails regarding summary judgment motion (0.3).	R. BENYAMIN	14.10	3,877.50
01/20/23	Proof and check record cites for brief and prepare exhibits (3)	D. KNISS	3.00	450.00



Shutterstock, Inc.  
350 Fifth Avenue  
New York, NY 10118  
Ebill through CounselGo

Atty No.: 00750  
Client ID: 50744-00009  
Invoice: 463316

February 27, 2023  
Page 19

01/20/23	Correspondence with A. Raff regarding particular aspects of declarations (0.4); revise memo of law to address length (0.9); review and comment on Shimmin declaration and 56.1 statement per client comments (0.6); respond to team questions regarding filing process and questions (0.2); review and draft notes on incoming motion in limine (0.3), 56.1 statement (0.5), and memo of law (0.3).	E. LACKMAN	3.00	1,545.00
01/20/23	Redact MSJ and Daubert Motion exhibits	E. MOSES	0.20	30.00
01/20/23	Finalize 56.1 statement and Motion for Summary Judgment; check cite check and apply changes, address comments and check cases as necessary; add citations; proof; review and address motion to seal changes and exhibits; coordinate on filing and address issues. (8.7); Review and apply cite check changes from Dalton Kniss; review and address comments and issues on Daubert Motion. (2.0); Address issue relating to deposition transcripts and filing; emails with Eleanor Lackman and opposing counsel on the same. (0.3); Review email from opposing counsel on confidentiality documents, provide analysis. (0.4)	E. NGUYEN	11.40	3,135.00



Shutterstock, Inc.  
350 Fifth Avenue  
New York, NY 10118  
Ebill through CounselGo

Atty No.: 00750  
Client ID: 50744-00009  
Invoice: 463316

February 27, 2023  
Page 20

01/20/23	Review emails from L. Zaharia regarding confidentiality designations and motion to seal (0.3); review and revise declaration of E. Lackman in support of summary judgment motion, and update spreadsheet regarding exhibits (1.1); multiple internal emails regarding summary judgment motion (1.0); review and revise 56.1 statement (3.9); review summary judgment motion, and insert citations to Rule 56.1 statement (1.6); finalize all papers in support of summary judgment motion (2.1).	R. BENYAMIN	10.00	2,750.00
01/23/23	Correspondence with client regarding confidentiality designations and approaches for opposition to summary judgment (0.5); review and comment on sealing letter (0.3); review and concurrently draft outline and points for opposition to moving brief (0.3).	E. LACKMAN	1.10	566.50
01/23/23	Address issues relating to motion to seal response per Judge's rules and e-file. (0.4); Email to Steve Heck regarding motion to exclude Heck testimony. (0.1); Review and analyze motion papers filed by opposing counsel to include MSJ, 56.1 statement, and Daubert Motion. (2.9)	E. NGUYEN	3.40	935.00
01/23/23	Draft response to letter motion to seal and supervise related research and filing (2.5); and review Plaintiff's summary judgment motion (2.5).	M. LEWIS	5.00	1,875.00





Shutterstock, Inc.  
350 Fifth Avenue  
New York, NY 10118  
Ebill through CounselGo

Atty No.: 00750  
Client ID: 50744-00009  
Invoice: 463316

February 27, 2023  
Page 21

01/23/23	Exchange internal emails regarding response to McGucken's motion to seal (0.4); review documents filed under seal by McGucken, and prepare internal email with summary of same (1.2); prepare email A. Raff regarding confidentiality designations of documents filed under seal, and review response from A. Raff regarding same (0.6); review TinEye Affiliate Agreement (0.4); research regarding motions to seal and third-party agreements (2.4); review deposition transcript of H. Shimmin for references to TinEye Affiliate Agreement (0.1); update response to McGucken's motion to seal (0.7).	R. BENYAMIN	5.80	1,595.00
01/24/23	Manage and maintain internal correspondence regarding brief filing (.1)	D. KNISS	0.10	15.00
01/24/23	Continued review of memo of law and outlining of points in response to arguments made in same (2.4); review and outline points for response to 56.1 statement (1.7).	E. LACKMAN	4.10	2,111.50
01/24/23	Analysis relating to Daubert Motion opposition deadline.	E. NGUYEN	0.20	55.00
01/25/23	Continued review of points in 56.1 statement and outlining of response to same (0.4).	E. LACKMAN	0.40	206.00



Shutterstock, Inc.  
350 Fifth Avenue  
New York, NY 10118  
Ebill through CounselGo

Atty No.: 00750  
Client ID: 50744-00009  
Invoice: 463316

February 27, 2023  
Page 22

01/25/23	Review and analyze emails from E. Lackman regarding plaintiff's memorandum of law and Rule 56.1 statement in support of plaintiff's summary judgment motion (1.4).	R. BENYAMIN	1.40	385.00
01/26/23	Meeting with team regarding arguments and tackling summary judgment and motion in limine oppositions (1.0)	E. LACKMAN	1.00	515.00
01/26/23	Draft and revise outline for opposition to exclude Heck. (1.7); Meeting with Eleanor Lackman, Marissa Lewis, and Rebecca Benyamin regarding motion for summary judgment opposition and opposition to Heck Daubert motion. (0.8)	E. NGUYEN	2.50	687.50
01/26/23	Continue to review Plaintiff's summary judgment motion and comments to same (2.5); team meeting regarding same (1.0); and draft Rule 56.1 counterstatement (3.0).	M. LEWIS	6.50	2,437.50
01/26/23	Conference with team to discuss strategy re: opposition to plaintiff's motion for summary judgment (0.7).	R. BENYAMIN	0.70	192.50
01/27/23	Review and comment on proposed outline for opposition to motion to exclude Heck report.	E. LACKMAN	1.50	772.50



Shutterstock, Inc.  
350 Fifth Avenue  
New York, NY 10118  
Ebill through CounselGo

Atty No.: 00750  
Client ID: 50744-00009  
Invoice: 463316

February 27, 2023  
Page 23

01/27/23	Legal research on expert reliability on industry standards, citation of sources requirement; review cases cited by Plaintiff's Daubert Motion; draft and revise detailed outline.	E. NGUYEN	6.60	1,815.00
01/27/23	Draft Rule 56.1 counterstatement and incorporate evidence.	M. LEWIS	5.00	1,875.00
01/30/23	Draft and revision opposition to Plaintiff's motion to exclude Steve Heck. (5.4); Review letters per Rebecca Benyamin for Lonely Planet use and exhibit in connection with California Complaint. (0.3)	E. NGUYEN	5.70	1,567.50
01/30/23	Draft opposition to summary judgment motion.	M. LEWIS	5.00	1,875.00
01/31/23	Review and revise memo of law in opposition to motion to exclude Heck testimony (1.8).	E. LACKMAN	1.80	927.00
01/31/23	Draft and revise opposition to Plaintiff's motion to exclude Steve Heck; Draft and revise Lackman Declaration in support. (4.7); Legal research on privilege log requirements and provide memo and analysis relating to McGucken's revised privilege log. (0.8)	E. NGUYEN	5.50	1,512.50
01/31/23	Continue to draft Rule 56.1 counterstatement and incorporate evidence.	M. LEWIS	3.20	1,200.00

Total Fees:







Shutterstock, Inc.  
 350 Fifth Avenue  
 New York, NY 10118  
 Ebill through CounselGo

Atty No.: 00750  
 Client ID: 50744-00009  
 Invoice: 463316

February 27, 2023  
 Page 24

### **Billing Summary**

<u>Name</u>	<u>Hours</u>	<u>Rate</u>	<u>Fees</u>
E. LACKMAN	[REDACTED] hours at	\$515.00 =	[REDACTED]
M. LEWIS	[REDACTED] hours at	\$375.00 =	
R. BENYAMIN	[REDACTED] hours at	\$275.00 =	
E. NGUYEN	[REDACTED] hours at	\$275.00 =	
D. KNISS	[REDACTED] hours at	\$150.00 =	
[REDACTED]	[REDACTED]	[REDACTED]	
E. MOSES	[REDACTED] hours at	\$150.00 =	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	

### **Costs Advanced and In-House Services:**

01/31/23	[REDACTED]	[REDACTED]
Total Costs:	[REDACTED]	[REDACTED]
Total Fees & Costs:	[REDACTED]	[REDACTED]



**MITCHELL SILBERBERG & KNUPP LLP**  
A LAW PARTNERSHIP INCLUDING PROFESSIONAL CORPORATIONS

Shutterstock, Inc.  
350 Fifth Avenue  
New York, NY 10118  
Ebill through CounselGo

Atty No.: 00750  
Client ID: 50744-00009  
Invoice: 463316

February 27, 2023

---

**REMITTANCE**  
(please include with payment)

---

Current Fees:

Current Disbursements:

**Total Current Charges - This Invoice:**



**Please remit to:**

Mitchell Silberberg & Knupp LLP  
2049 Century Park East, 18th Floor  
Los Angeles, CA 90067

**Wire/ACH Transfer Instructions:**

Routing Number or ABA: 121000248  
Bank Name: Wells Fargo Bank, N.A.  
Bank Address: 420 Montgomery, San Francisco, CA 94104  
Beneficiary Account No.: 4159349430  
Beneficiary Account Name: Mitchell Silberberg & Knupp LLP  
For International Transfers for payments in USD: Swift BIC WFBIUS6S  
For International Transfers for payments in currencies other than USD: Swift BIC WFBIUS6WFFX  
For payment inquiries please e-mail [payment@msk.com](mailto:payment@msk.com)

\*\*\* Please Include Invoice Number with Payment \*\*\*

Note that MSK will not change its banking information without prior notice on our bills. All MSK emails originate from a [3 initials]@msk.com address. Phishing and fraud attempts are common, especially those requesting that you send payment to a new account that does not match our bills. Please don't hesitate to call if you ever have any doubt about the authenticity of any communication.



**MITCHELL SILBERBERG & KNUPP LLP**  
A LAW PARTNERSHIP INCLUDING PROFESSIONAL CORPORATIONS

Shutterstock, Inc.  
350 Fifth Avenue  
New York, NY 10118  
Ebill through CounselGo

Atty No.: 00750  
Client ID: 50744-00009  
Invoice: 464542

March 27, 2023

**LEGAL SERVICES RENDERED** through February 28, 2023

Re: ads. Elliot McGucken  
AIG Claim: 3488935673US,

[REDACTED]  
[REDACTED]  
[REDACTED]

Total - current charges:





Shutterstock, Inc.  
350 Fifth Avenue  
New York, NY 10118  
Ebill through CounselGo

Atty No.: 00750  
Client ID: 50744-00009  
Invoice: 464542

March 27, 2023  
Page 2

**ads. Elliot McGucken**  
**AIG Claim: 3488935673US,**

**Fees through February 28, 2023:**

02/02/23	Conference with S. Heck regarding issues in motion in limine (0.5); draft declaration for opposition (0.7).	E. LACKMAN	1.20	618.00
02/02/23	Cite-check/quote check opposition to motion to exclude Heck expert testimony and emails with R. Benyamin regarding same	E. MOSES	3.70	555.00
02/02/23	Continue to draft Rule 56.1 counterstatement and incorporate evidence (1.8); attention to opposition to motion to exclude (0.5); and emails with R. Benyamin regarding opposition (0.2).	M. LEWIS	2.50	937.50



Shutterstock, Inc.  
 350 Fifth Avenue  
 New York, NY 10118  
 Ebill through CounselGo

Atty No.: 00750  
 Client ID: 50744-00009  
 Invoice: 464542

March 27, 2023  
 Page 3

02/02/23	Review and analyze comments from E. Lackman regarding opposition to motion to exclude testimony of S. Heck, and incorporate same (1.3); exchange emails with M. Lewis regarding opposition (0.2); exchange emails with E. Moses regarding cite checking opposition (0.1); review cite-check of opposition (0.6); revise opposition to incorporate new points in declaration of S. Heck (1.1); exchange internal emails regarding filing (0.2).	R. BENYAMIN	3.50	962.50
02/03/23	Conduct final reviews and revisions on opposition to motion in limine (0.4); correspondence with client and expert regarding loose ends (0.2).	E. LACKMAN	0.60	309.00
	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
02/04/23	Review and draft outline and plan for reply brief in further support of motion to disqualify Maddrey.	E. LACKMAN	1.70	875.50
02/05/23	Review plaintiff's summary judgment motion regarding DMCA (1.0); conduct research and review fact citations (1.0); and draft opposition to DMCA section (2.5).	M. LEWIS	4.50	1,687.50



Shutterstock, Inc.  
 350 Fifth Avenue  
 New York, NY 10118  
 Ebill through CounselGo

Atty No.: 00750  
 Client ID: 50744-00009  
 Invoice: 464542

March 27, 2023  
 Page 4

02/06/23	Review motion to exclude Maddrey report and related report (3.0); review plaintiff's opposition and conduct research (2.8); preparation and confer with R. Benyamin regarding next steps (0.5).	M. LEWIS	6.30	2,362.50
----------	---	----------	------	----------

--	--	--	--	--

02/07/23	Review cases cited in motion to exclude Maddrey report (2.4); conduct follow-up research (2.5); and draft reply on motion to exclude Maddrey report (4.0).	M. LEWIS	8.90	3,337.50
----------	--	----------	------	----------

02/07/23	Research regarding case law cited in plaintiff's opposition to motion to exclude expert testimony of T. Maddrey (2.6); review sample reply briefs (0.7); draft and revise qualifications section of reply brief to plaintiff's opposition (3.1).	R. BENYAMIN	6.40	1,760.00
----------	--	-------------	------	----------

--	--	--	--	--



02/08/23	Review and revise reply on motion in limine (Maddrey) (1.0); review new judge's rules and report on same and opposition brief planning (0.6).	E. LACKMAN	1.60	824.00
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]



Shutterstock, Inc.  
 350 Fifth Avenue  
 New York, NY 10118  
 Ebill through CounselGo

Atty No.: 00750  
 Client ID: 50744-00009  
 Invoice: 464542

March 27, 2023  
 Page 6

02/08/23	Exchange emails with M. Lewis regarding counterstatement of facts (0.1); email library to pull litigation statistics on Judge Rearden (0.1); review research regarding Judge Rearden (0.5); review Judge Rearden's individual rules of practice (0.2); telephone conference with M. Lewis regarding tasks for opposition to plaintiff's summary judgment motion (0.3); exchange emails with E. Lackman and M. Lewis regarding notice of reassignment (0.2); review Huff Post article regarding Judge Rearden (0.2); review and analyze cases cited in plaintiff's opposition to motion to exclude testimony of T. Maddrey, and distinguish same (1.5); review and analyze comments from M. Lewis regarding counterstatement of facts, and fill in blanks regarding same (3.4); search file for Hane Street allegations in Itasca (0.3).	R. BENYAMIN	6.80	1,870.00
02/09/23	Proof and cite check reply to motion to exclude (3.5)	D. KNISS	3.50	525.00
02/09/23	Review McGucken MSJ argument re Hane street infringement notice and review Itasca records for information for asset id contributors, and strategize with R. Benyamin regarding preparation of opposition information	E. MOSES	0.70	105.00

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

March 27, 2023  
Page 7

02/09/23	Incorporate comments and supervise cite-checking on reply on motion to exclude Maddrey report (2.5); draft opposition to plaintiff's summary judgment motion, including conducting research (2.0) and drafting section regarding direct infringement (4.0); and confer with R. Benyamin regarding Judge Rearden and Hane Street images (0.5).	M. LEWIS	9.00	3,375.00
----------	---	----------	------	----------

02/10/23	Continued research on documents to counter argument re Hane Street infringement information in March 2020 take down and emails with R. Benyamin regarding same	E. MOSES	1.00	150.00
----------	--	----------	------	--------



March 27, 2023  
Page 8

Date	Description	Attorney	Hours	Fees
02/12/23	Draft opposition to plaintiff's summary judgment motion, including reviewing cited cases (0.5) and drafting section regarding secondary liability (3.0); and provide comments to R. Benyamin regarding counterstatement (0.5).	M. LEWIS	4.00	1,500.00
02/13/23	Manage and maintain document productions (.2)	D. KNISS	0.20	30.00
02/13/23	Review and comment on proposed counterstatement of material facts.	E. LACKMAN	1.20	618.00
02/13/23	Email R. Benyamin Heather Shimmin transcript for summary judgment opposition; process Shimmin depo invoice for payment	E. MOSES	0.10	15.00



Shutterstock, Inc.  
 350 Fifth Avenue  
 New York, NY 10118  
 Ebill through CounselGo

Atty No.: 00750  
 Client ID: 50744-00009  
 Invoice: 464542

March 27, 2023  
 Page 9

02/13/23	Draft opposition to plaintiff's summary judgment motion, including reviewing cited cases (1.0) and drafting sections regarding CMI claim (3.5); review and revise Rule 56.1 counterstatement (3.5); and draft opposition declaration (1.3).	M. LEWIS	9.30	3,487.50
	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
02/14/23	Continued review and comment on counterstatement of material facts (0.9); review and revise full opposition brief (3.0).	E. LACKMAN	3.90	2,008.50
02/14/23	Continue to draft opposition declaration (4.5); revise Rule 56.1 counterstatement per E. Lackman's comments and confer with R. Benyamin regarding same (3.0); and review and revise all opposition papers (4.9).	M. LEWIS	12.40	4,650.00



Shutterstock, Inc.  
350 Fifth Avenue  
New York, NY 10118  
Ebill through CounselGo

Atty No.: 00750  
Client ID: 50744-00009  
Invoice: 464542

March 27, 2023  
Page 10

02/14/23	Review and analyze comments from E. Lackman and M. Lewis regarding counterstatement, and respond to same (3.6); review and revise opposition declaration of H. Shimmin (1.4); exchange emails with M. Lewis regarding counterstatement (0.2); prepare clean versions of counterstatement and declaration of H. Shimmin, and email A. Raff regarding same (0.4).	R. BENYAMIN	5.60	1,540.00
02/15/23	Run Westlaw report and further research to retrieve non case authority and cite check Shutterstock opposition to McGucken MSJ	E. MOSES	3.80	570.00
02/15/23	Revise opposition to plaintiff's summary judgment motion per E. Lackman's comments (4.0); draft statement of additional material facts (4.0).	M. LEWIS	8.00	3,000.00
02/16/23	Review and respond to open questions on 56.1(b) statement and memo of law (0.4).	E. LACKMAN	0.40	206.00
02/16/23	Cite check and quote check opposition to McGucken MSJ brief	E. MOSES	6.00	900.00





Shutterstock, Inc.  
 350 Fifth Avenue  
 New York, NY 10118  
 Ebill through CounselGo

Atty No.: 00750  
 Client ID: 50744-00009  
 Invoice: 464542

March 27, 2023  
 Page 11

[REDACTED]		[REDACTED]	[REDACTED]	[REDACTED]
02/16/23	Revise opposition papers and incorporate A. Raff's comments (3.5); revise Rule 56.1 counterstatement and confer with E. Lackman regarding same (2.7); and supervise cite-checking and tables (2.0).	M. LEWIS	8.20	3,075.00
02/17/23	Incorporate comments and finalize all opposition papers (5.2); and review evidence and correspondence regarding StockFresh (0.8).	M. LEWIS	6.00	2,250.00
[REDACTED]		[REDACTED]	[REDACTED]	[REDACTED]
02/21/23	Review opposition papers and concurrently prepare comprehensive outline of comments and points for reply brief.	E. LACKMAN	3.40	1,751.00
02/21/23	Continue to review plaintiff's opposition to summary judgment motion (2.0); and conduct research and outline reply (2.0).	M. LEWIS	4.00	1,500.00



Shutterstock, Inc.  
 350 Fifth Avenue  
 New York, NY 10118  
 Ebill through CounselGo

Atty No.: 00750  
 Client ID: 50744-00009  
 Invoice: 464542

March 27, 2023  
 Page 12

[REDACTED]		[REDACTED]	[REDACTED]	[REDACTED]
02/22/23	Review and comment on joint status letter (0.3).	E. LACKMAN	0.30	154.50
02/22/23	Revise joint letter (0.3); and draft reply brief to summary judgment motion (3.7).	M. LEWIS	4.00	1,500.00
02/22/23	Review and analyze email from E. Lackman regarding reply brief in support of motion for summary judgment (0.4).	R. BENYAMIN	0.40	110.00
[REDACTED]		[REDACTED]	[REDACTED]	[REDACTED]
02/23/23	Draft reply brief to summary judgment motion, including reviewing cited cases and drafting sections regarding DMCA (3.3) and direct liability (4.0).	M. LEWIS	7.30	2,737.50



Shutterstock, Inc.  
350 Fifth Avenue  
New York, NY 10118  
Ebill through CounselGo

Atty No.: 00750  
Client ID: 50744-00009  
Invoice: 464542

March 27, 2023  
Page 13

[REDACTED]		[REDACTED]	[REDACTED]	[REDACTED]
02/24/23	Review and analyze comments from M. Lewis regarding DMCA section of reply brief in support of motion for summary judgment, and respond to same (2.8); research case law cited in plaintiff's opposition to Shutterstock's motion for summary judgment, and distinguish same (1.0).	R. BENYAMIN	3.80	1,045.00
02/26/23	Review and address plaintiff's cited cases and evidence in reply brief (3.0); and review and provide comments to R. Benyamin regarding DMCA section of reply brief (0.4).	M. LEWIS	3.40	1,275.00
[REDACTED]		[REDACTED]	[REDACTED]	[REDACTED]0
02/27/23	Review and analyze comments from M. Lewis regarding DMCA section of reply brief in support of motion for summary judgment, and respond to same (1.2); proofread reply brief (1.0).	R. BENYAMIN	2.20	605.00
02/28/23	Add citations to reply brief in support of motion for summary judgment (1.5); exchange emails with M. Ocubillo regarding reply brief filing (0.1).	R. BENYAMIN	1.60	440.00





Shutterstock, Inc.  
 350 Fifth Avenue  
 New York, NY 10118  
 Ebill through CounselGo

Atty No.: 00750  
 Client ID: 50744-00009  
 Invoice: 464542

March 27, 2023  
 Page 14

Total Fees:

[REDACTED]

**Billing Summary**

<u>Name</u>	<u>Hours</u>	<u>Rate</u>	<u>Fees</u>
E. LACKMAN	[REDACTED] hours at	\$515.00 =	[REDACTED]
M. LEWIS	[REDACTED] hours at	\$375.00 =	
R. BENYAMIN	[REDACTED] hours at	\$275.00 =	
[REDACTED]	[REDACTED]	[REDACTED]	
E. MOSES	[REDACTED] hours at	\$150.00 =	
[REDACTED]	[REDACTED]	[REDACTED]	
D. KNISS	[REDACTED] hours at	\$150.00 =	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	



**MITCHELL SILBERBERG & KNUPP LLP**  
A LAW PARTNERSHIP INCLUDING PROFESSIONAL CORPORATIONS

Shutterstock, Inc.  
350 Fifth Avenue  
New York, NY 10118  
Ebill through CounselGo

Atty No.: 00750  
Client ID: 50744-00009  
Invoice: 464542

March 27, 2023

---

**REMITTANCE**  
(please include with payment)

---

Current Fees:

Current Disbursements:

**Total Current Charges - This Invoice:**



**Please remit to:**

Mitchell Silberberg & Knupp LLP  
2049 Century Park East, 18th Floor  
Los Angeles, CA 90067

**Wire/ACH Transfer Instructions:**

Routing Number or ABA: 121000248  
Bank Name: Wells Fargo Bank, N.A.  
Bank Address: 420 Montgomery, San Francisco, CA 94104  
Beneficiary Account No.: 4159349430  
Beneficiary Account Name: Mitchell Silberberg & Knupp LLP  
For International Transfers for payments in USD: Swift BIC WFBIUS6S  
For International Transfers for payments in currencies other than USD: Swift BIC WFBIUS6WFFX  
For payment inquiries please e-mail [payment@msk.com](mailto:payment@msk.com)

\*\*\* Please Include Invoice Number with Payment \*\*\*

Note that MSK will not change its banking information without prior notice on our bills. All MSK emails originate from a [3 initials]@msk.com address. Phishing and fraud attempts are common, especially those requesting that you send payment to a new account that does not match our bills. Please don't hesitate to call if you ever have any doubt about the authenticity of any communication.



**MITCHELL SILBERBERG & KNUPP LLP**  
A LAW PARTNERSHIP INCLUDING PROFESSIONAL CORPORATIONS

Shutterstock, Inc.  
350 Fifth Avenue  
New York, NY 10118  
Ebill through CounselGo

Atty No.: 00750  
Client ID: 50744-00009  
Invoice: 465052

April 7, 2023

**LEGAL SERVICES RENDERED** through March 31, 2023

Re: ads. Elliot McGucken  
AIG Claim: 3488935673US,  
Disbursements and charges per attached

[REDACTED] 0

[REDACTED]

Total - current charges:

[REDACTED]





Shutterstock, Inc.  
350 Fifth Avenue  
New York, NY 10118  
Ebill through CounselGo

Atty No.: 00750  
Client ID: 50744-00009  
Invoice: 465052

April 7, 2023  
Page 2

**ads. Elliot McGucken**  
**AIG Claim: 3488935673US.**

**Fees through March 31, 2023:**

03/01/23	Review and revise reply brief (1.0).	E. LACKMAN	1.00	515.00
03/01/23	Cite check MSJ Reply brief and edit brief accordingly	E. MOSES	5.00	750.00
03/01/23	Review and incorporate comments to reply brief (1.5); and email E. Moses regarding cite-checking (0.2).	M. LEWIS	1.70	637.50
03/02/23	Review client comments and respond on same.	E. LACKMAN	0.70	360.50
03/02/23	Review and incorporate comments to reply brief (1.6); finalize reply declaration and exhibit (0.5); review cite-checking (0.4); and emails with E. Lackman and R. Benyamin regarding same (0.5).	M. LEWIS	3.00	1,125.00
03/02/23	Review email from M. Lewis regarding tasks for reply brief (0.2); emails with M. Ocubillo regarding filing of reply brief (0.2); add citations to reply brief (1.6); cite-check reply brief (0.3).	R. BENYAMIN	2.30	632.50
03/03/23	Review and revise letter to court regarding oral argument.	E. LACKMAN	0.30	154.50



Shutterstock, Inc.  
 350 Fifth Avenue  
 New York, NY 10118  
 Ebill through CounselGo

Atty No.: 00750  
 Client ID: 50744-00009  
 Invoice: 465052

April 7, 2023  
 Page 3

03/03/23	Review and finalize reply papers and supervise filing (1.0); attention to outstanding citations and email R. Benyamin regarding same (0.5); review Judge Rearden's Individual Rules (0.2); and draft letter request for oral argument (0.4).	M. LEWIS	2.10	787.50
03/03/23	Cite-check record cites in reply brief (1.8); team meeting to discuss reply brief filing (0.2); review Judge Rearden's individual rules (0.1); arrange courtesy copies motion for summary judgment papers (1.1); review and revise letter request for oral argument (0.1); review and finalize reply brief for filing (0.2); email courtesy copy of motion for summary judgment papers to Judge Rearden (0.2).	R. BENYAMIN	3.70	1,017.50
03/08/23	Review reply papers (0.5); draft memo to team regarding open items and new evidence (0.2).	E. LACKMAN	0.70	360.50
03/08/23	Review plaintiff's reply brief and exhibits and analyze need for potential surreply (1.5); conduct research regarding new arguments (0.6); and email E. Lackman regarding same (0.6).	M. LEWIS	2.70	1,012.50



Shutterstock, Inc.  
350 Fifth Avenue  
New York, NY 10118  
Ebill through CounselGo

Atty No.: 00750  
Client ID: 50744-00009  
Invoice: 465052

April 7, 2023  
Page 4

03/08/23	Review emails from E. Lackman and M. Lewis regarding plaintiff's reply brief in support of plaintiff's summary judgment motion (0.2); review plaintiff's reply brief (0.2); review plaintiff's prior motion to compel and related letters to the court, and search for requests for information concerning referrals and subscriptions from Shutterstock's affiliates (1.3).	R. BENYAMIN	1.70	467.50
----------	--	-------------	------	--------

--	--	--	--

03/29/23	Draft email to plaintiff's counsel regarding required pre-motion conference.	E. LACKMAN	0.40	206.00
----------	--	------------	------	--------

Total Fees:

**Billing Summary**

<u>Name</u>	<u>Hours</u>	<u>Rate</u>	<u>Fees</u>
E. LACKMAN		hours at \$515.00 =	
M. LEWIS		hours at \$375.00 =	
R. BENYAMIN		hours at \$275.00 =	
E. MOSES		hours at \$150.00 =	





Shutterstock, Inc.  
350 Fifth Avenue  
New York, NY 10118  
Ebill through CounselGo

Atty No.: 00750  
Client ID: 50744-00009  
Invoice: 465052

April 7, 2023  
Page 5

**Costs Advanced and In-House Services:**

03/06/23 Deposition/Transcript of Of Heather Shimmin,  
9/20/22 - Veritext

[REDACTED]

[REDACTED] Costs:

[REDACTED]

Total Fees & Costs:

[REDACTED]



**MITCHELL SILBERBERG & KNUPP LLP**  
A LAW PARTNERSHIP INCLUDING PROFESSIONAL CORPORATIONS

Shutterstock, Inc.  
350 Fifth Avenue  
New York, NY 10118  
Ebill through CounselGo

Atty No.: 00750  
Client ID: 50744-00009  
Invoice: 465052

April 7, 2023

---

**REMITTANCE**  
(please include with payment)

---

Current Fees:

Current Disbursements:

**Total Current Charges - This Invoice:**



**Please remit to:**

Mitchell Silberberg & Knupp LLP  
2049 Century Park East, 18th Floor  
Los Angeles, CA 90067

**Wire/ACH Transfer Instructions:**

Routing Number or ABA: 121000248  
Bank Name: Wells Fargo Bank, N.A.  
Bank Address: 420 Montgomery, San Francisco, CA 94104  
Beneficiary Account No.: 4159349430  
Beneficiary Account Name: Mitchell Silberberg & Knupp LLP  
For International Transfers for payments in USD: Swift BIC WFBIUS6S  
For International Transfers for payments in currencies other than USD: Swift BIC WFBIUS6WFFX  
For payment inquiries please e-mail [payment@msk.com](mailto:payment@msk.com)

\*\*\* Please Include Invoice Number with Payment \*\*\*

Note that MSK will not change its banking information without prior notice on our bills. All MSK emails originate from a [3 initials]@msk.com address. Phishing and fraud attempts are common, especially those requesting that you send payment to a new account that does not match our bills. Please don't hesitate to call if you ever have any doubt about the authenticity of any communication.



**MITCHELL SILBERBERG & KNUPP LLP**  
A LAW PARTNERSHIP INCLUDING PROFESSIONAL CORPORATIONS

Shutterstock, Inc.  
350 Fifth Avenue  
New York, NY 10118  
Ebill through CounselGo

Atty No.: 00750  
Client ID: 50744-00009  
Invoice: 473665

October 18, 2023

**LEGAL SERVICES RENDERED** through September 30, 2023

Re: ads. Elliot McGucken  
AIG Claim: 3488935673US,

[REDACTED]  
[REDACTED]  
[REDACTED]

TOTAL DUE:





Shutterstock, Inc.  
 350 Fifth Avenue  
 New York, NY 10118  
 Ebill through CounselGo

Atty No.: 00750  
 Client ID: 50744-00009  
 Invoice: 473665

October 18, 2023  
 Page 2

**ads. Elliot McGucken**  
**AIG Claim: 3488935673US,**

**Fees through September 30, 2023:**

[REDACTED]		[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]		[REDACTED]	[REDACTED]	[REDACTED]
09/29/23	Analysis of Exhibits 19 and 44 based on court's order on sealing, check to see status of motions to seal. (0.2); Review and prepare analysis of court order on McGucken's motion to seal. (0.3)	E. NGUYEN	0.50	137.50

Total Fees:

**Billing Summary**

<u>Name</u>	<u>Hours</u>	<u>Rate</u>	<u>Fees</u>
E. LACKMAN	[REDACTED] hours at	\$515.00 =	[REDACTED]
E. NGUYEN	[REDACTED] hours at	\$275.00 =	[REDACTED]
SUMMARY TOTALS	[REDACTED]		[REDACTED]



**MITCHELL SILBERBERG & KNUPP LLP**  
A LAW PARTNERSHIP INCLUDING PROFESSIONAL CORPORATIONS

Shutterstock, Inc.  
350 Fifth Avenue  
New York, NY 10118  
Ebill through CounselGo

Atty No.: 00750  
Client ID: 50744-00009  
Invoice: 473665

October 18, 2023

---

**REMITTANCE**  
(please include with payment)

---

Current Fees:

Current Disbursements:

**Total Current Charges - This Invoice:**



**Please remit to:**

Mitchell Silberberg & Knupp LLP  
2049 Century Park East, 18th Floor  
Los Angeles, CA 90067

**Wire/ACH Transfer Instructions:**

Routing Number or ABA: 121000248  
Bank Name: Wells Fargo Bank, N.A.  
Bank Address: 420 Montgomery, San Francisco, CA 94104  
Beneficiary Account No.: 4159349430  
Beneficiary Account Name: Mitchell Silberberg & Knupp LLP  
For International Transfers for payments in USD: Swift BIC WFBIUS6S  
For International Transfers for payments in currencies other than USD: Swift BIC WFBIUS6WFFX  
For payment inquiries please e-mail [payment@msk.com](mailto:payment@msk.com)

\*\*\* Please Include Invoice Number with Payment \*\*\*

Note that MSK will not change its banking information without prior notice on our bills. All MSK emails originate from a [3 initials]@msk.com address or [mskbilling@msk.com](mailto:mskbilling@msk.com). Phishing and fraud attempts are common, especially those requesting that you send payment to a new account that does not match our bills. Please don't hesitate to call if you ever have any doubt about the authenticity of any communication.